

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**AFFIDAVIT OF ERIK F. STIDHAM IN
SUPPORT OF MOTION FOR
APPOINTMENT OF DISCOVERY
REFEREE**

STATE OF IDAHO)
 :SS.
County of ADA)

I, Erik F. Stidham, being first duly sworn upon oath, depose and state as follows:

1. I am an attorney with the firm of Holland & Hart LLP (“Holland & Hart”) and serve as counsel for the Plaintiffs in this case. I make this declaration based on my personal knowledge.

2. During the limited deposition of Diego Rodriguez, taken October 5, 2022, Mr. Rodriguez refused to answer a number of basic questions. A true and correct copy of excerpts from the deposition transcript is attached hereto as **Exhibit A**.

3. On December 13, 2022, the Court ordered Rodriguez to pay fees in the amount of \$5,408.10 no later than thirty days from the date of the order. Rodriguez did not pay the court-ordered fees by the deadline ordered and still has not paid to this day.

4. On October 7, 2022, Plaintiffs served interrogatories and requests for production on Rodriguez. His responses were woefully deficient, and this Court detailed in an order the requests he was required to supplement no later than February 22, 2023. Rodriguez provided no supplementation by February 22, 2023—or to date.

5. Plaintiffs properly noticed Rodriguez’s deposition for January 10, 2023—after Rodriguez represented that he would be available on January 10, 2023. Rodriguez refused to confirm whether he would attend, forcing Plaintiffs’ counsel to prepare for the deposition and travel to Orlando to take it. Rodriguez did not show up.

6. When the Court ordered Rodriguez to provide by noon on February 15, 2023, two possible start dates for a deposition between February 25, 2023 and March 25, 2023 and the city, state, and country where he would be on the provided dates, Rodriguez violated the Court’s

order. He provided on February 14, 2023, only one possible start date—and a location where it is illegal to take depositions. <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/Brazil.html>. When Plaintiffs' counsel responded to this email correspondence, Rodriguez simply replied with discriminatory hate speech. A true and correct copy of the email correspondence between Plaintiffs' counsel and Rodriguez from February 14, 15, and 22, 2023 is attached hereto as **Exhibit B**.

7. Plaintiffs have attempted to take Rodriguez's deposition for six months, which Rodriguez has wrongfully resisted, in violation of multiple court orders. Plaintiffs have yet to receive basic interrogatory responses and documents in response to their requests for production from six months ago. At every turn, Rodriguez has violated his discovery obligations.

8. Moreover, Rodriguez refuses to engage in any meet and confer communications. He rarely responds to any email communications from Plaintiffs' counsel, and when he does, he sends counterproductive messages, like the one attached as Exhibit B.

9. Rodriguez recently served interrogatories and requests for production on Plaintiffs. Plaintiffs are working on responding to them. However, the requests are very broad and will require significant resources to answer. Plaintiffs anticipate it will cost over \$100,000 in order to respond to the requests.

10. Attached hereto as **Exhibit C** is a true and correct copy of the webpage found at <https://diegorodriguez.org/>, downloaded at my direction on April 3, 2023.

11. Attached hereto as **Exhibit D** is a true and correct copy of the webpage found at <https://www.freedomtabernacle.net/>, downloaded at my direction on April 3, 2023.

12. Attached hereto as **Exhibit E** is a true and correct copy of the webpage found at <https://www.freedomtabernacle.net/articles-of-faith/>, downloaded at my direction on April 3, 2023.

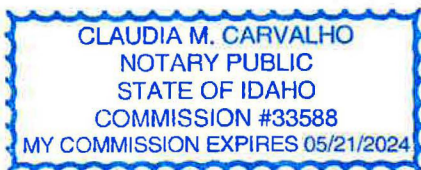
13. Attached hereto as **Exhibit F** is a true and correct copy of the March 9, 2023 Annual Report for Freedom Tabernacle, Incorporated, available on the Idaho Secretary of State's website and downloaded at my direction on April 3, 2023.

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

Executed this 3rd day of April, 2023.


Erik F. Stidham

SUBSCRIBED AND SWORN TO before me this 3rd day of April, 2023.




(Signature of notarial officer)

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April, 2023, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered via Process Server
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered via Process Server
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered via Process Server
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered via Process Server
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered via Process Server
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Jennifer M. Jensen

Jennifer M. Jensen
OF HOLLAND & HART LLP

21228396_v1

EXHIBIT A

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

Case No. CV01-22-06789
ST. LUKE'S HEALTH SYSTEM, LTD; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, an individual; NATASHA D. ERICKSON, MD, an individual; and TRACY W. JUNGMAN, NP, an individual,
Plaintiffs,
vs.
AMMON BUNDY, an individual; AMMON BUNDY FOR GOVERNOR, a political organization; DIEGO RODRIGUEZ, an individual; FREEDOM MAN PRESS LLC, a limited liability company; FREEDOM MAN PAC, a registered political action committee; and PEOPLE'S RIGHTS NETWORK, a political organization,
Defendants.

REMOTE VIDEORECORDED DEPOSITION OF DIEGO RODRIGUEZ - VIA ZOOM
October 5, 2022

Reported by
Tiffany Fisher, RPR, CRR
CSR No. 979

1 WITNESS
2
3 PAGE:
4 DIEGO RODRIGUEZ
5 Examination by Mr. Stidham..... 6
6
7 * * * * *
8
9 E X H I B I T S
10
11 PAGE:
12 1. Freedom Man Press website Privacy Policy 24
13 2. Screenshot of About Freedom Man Press 27
14 3. Screenshot of Fred Martin Article 29
15 4. Screen content from Freedom Man website 34
16 regarding Levi Anderson 42
17 5. Screen content from website regarding people 42
18 responsible for Cyrus's kidnapping 58
19 6. Screen content from website re regarding child 58
20 trafficker profile, Dr. Natasha Erickson 78
21 7. Screenshot from website of link to pro-freedom 80
22 websites
23 * * * * *
24
25

REMOTE VIDEORECORDED DEPOSITION OF DIEGO RODRIGUEZ, taken at the instance of the Plaintiffs, VIA ZOOM, commencing at 8:40 a.m., on October 5, 2022, before Tiffany Fisher, RPR, CRR, Court Reporter, a Notary Public in and for the State of Idaho, pursuant to notice, and in accordance with the applicable rules of procedure.

A P P E A R A N C E S :

FOR THE PLAINTIFFS

Erik F. Stidham
Zach McCraney
HOLLAND & HART, LLP
800 West Main Street, Suite 1750
Boise, Idaho 83702
(208) 342-5000
efstidham@hollandhart.com
Aubrey Lyon
David Barton
ST. LUKE'S HEALTH SYSTEM
190 East Bannock Street
Boise, Idaho 83712
(208) 706-6785
lyona@slhs.org
bartond@slhs.org

FOR DEFENDANT DIEGO RODRIGUEZ
Diego Rodriguez, pro se
freedommanpress@protonmail.com

ALSO PRESENT

Tracy Jungman

VIDEOGRAPHER

Spencer Harrison, Tucker & Associates

1 ZOOM DEPOSITION
2 October 5, 2022, 8:40 a.m.

3
4 THE VIDEOGRAPHER: Okay. We are now on the
5 record. Please silence your cellphones and place
6 them away from any microphones. Recording will
7 continue until all parties agree to go off the
8 record.

9 My name is Spencer Harrison,
10 representing Tucker & Associates. Today is
11 Wednesday, October 5th. The time is approximately
12 8:40 a.m. This deposition is being held remotely
13 via Zoom.

14 The caption of this case is St. Luke's
15 Health System vs. Ammon Bundy. Case number is
16 No. CV01-22-06789. The case is filed in the
17 District Court of the Fourth Judicial District of
18 the State of Idaho, in the County of Ada.

19 The name of the witness is
20 Diego Rodriguez.

21 Will the attorneys in the room or, in
22 this case, attending remotely identify themselves
23 and the parties they represent.

24 MR. STIDHAM: This is Erik Stidham of
25 Holland & Hart, representing the plaintiffs.

1 Also from Holland & Hart is
 2 Zach McCraney, who is also here. And then I'll
 3 also identify in-house counsel, David Barton.
 4 MR. BARTON: Good morning.
 5 MR. STIDHAM: And in-house counsel,
 6 Aubrey Lyon, for St. Luke's Health System.
 7 Also on is one of the individual
 8 plaintiffs, Ms. Jungman.
 9 THE VIDEOGRAPHER: Any other attorneys
 10 attending remotely?
 11 All right. Our court reporter,
 12 Tiffany Fisher, will swear the witness, and we can
 13 proceed.
 14 THE REPORTER: Would you raise your right
 15 hand, please.
 16 Do you solemnly swear or affirm that
 17 the testimony you shall give today will be the
 18 truth, the whole truth, and nothing but the truth?
 19 THE WITNESS: Yes.
 20
 21 DIEGO RODRIGUEZ,
 22 produced as a witness at the instance of the
 23 Plaintiffs, having been first duly sworn, was
 24 Examined and testified as follows:
 25 ///

1 **making it difficult for the court reporter.**
 2 **Is that fair?**
 3 A. Sure.
 4 **Q. Also, Mr. Rodriguez, it's not an**
 5 **endurance contest. If you need to take a break**
 6 **for some reason and there's not a question**
 7 **pending, we'll do our best to accommodate that.**
 8 **Is that fair?**
 9 A. Sounds good.
 10 **Q. Also, even though we're on video, it is**
 11 **being transcribed. So it's required that you**
 12 **respond verbally, not just with a gesture or a**
 13 **head shake.**
 14 **Do you understand that?**
 15 A. Sure, no problem.
 16 **Q. Okay. All right. And, also, do you**
 17 **understand that you're under oath, and you're**
 18 **sworn to tell the truth just as if you were in a**
 19 **court of law?**
 20 A. Yes, I do.
 21 **Q. Okay. Also, is there anyone else in**
 22 **the room with you?**
 23 A. Nope.
 24 **Q. Okay. And let me ask you this.**
 25 **What, if anything, did you do to**

1 EXAMINATION
 2 BY MR. STIDHAM:
 3 **Q. Mr. Rodriguez, my name is Erik Stidham,**
 4 **and I represent the plaintiffs in this matter.**
 5 **As an initial question, have you ever**
 6 **had your deposition taken before?**
 7 A. No.
 8 **Q. Let me go over some of the ground rules**
 9 **so it will hopefully make the exchange more**
 10 **efficient. First, if I ask you a question,**
 11 **Mr. Rodriguez, and for any reason you don't**
 12 **understand it, please ask me to rephrase it and**
 13 **I'll do my best to rephrase it.**
 14 **Is that fair?**
 15 A. Fair enough.
 16 **Q. And if I ask you a question,**
 17 **Mr. Rodriguez, and you answer, I will assume you**
 18 **understood it.**
 19 **Fair?**
 20 A. Fair.
 21 **Q. Another thing I should state is I have**
 22 **a bad habit of pausing in the middle of my**
 23 **questions. Please do your best to let me complete**
 24 **the question before you respond. That way we will**
 25 **avoid, hopefully, speaking over one another and**

1 **prepare for your deposition?**
 2 A. Nothing.
 3 **Q. Did you meet with anybody to prepare**
 4 **for your deposition?**
 5 A. Nope.
 6 **Q. Did you meet with any attorneys to**
 7 **prepare for your deposition?**
 8 A. To prepare for my deposition? No. Do
 9 I have friends who have given me tips and advice?
 10 Yes. Have I met with anybody specifically to
 11 prepare for a deposition? No.
 12 **Q. All right. Let me try to rephrase it,**
 13 **then.**
 14 **Have you met or spoken with anybody in**
 15 **order to prepare for your deposition?**
 16 A. Define what you mean by preparing for
 17 the deposition.
 18 **Q. Well, I meant it broadly, sir, so I**
 19 **could hopefully encapsulate the question broadly.**
 20 **You don't understand what "prepare"**
 21 **means?**
 22 A. I don't understand what you're trying
 23 to get at, in terms of the question.
 24 But have I spoken to people about the
 25 deposition? Absolutely.

Page 9

1 Q. Have you spoken with folks in an effort
2 to prepare yourself to respond to the questions?

3 A. No.

4 Q. Thank you.

5 Have you reviewed any documents to
6 prepare yourself for the deposition?

7 A. I've reviewed many of the documents
8 that you guys sent to me. I've done all types of
9 searching on the Internet in terms of what is a
10 deposition, what is its purpose, how does it go,
11 things like that. But that's basically it.

12 Q. Okay. Would you state --

13 A. You sent me some documents this
14 morning. I haven't had a chance to look at those
15 because you just barely sent those. But it looks
16 like, from what I could see, just a bunch of
17 screenshots from my website.

18 Q. What those were or are, are the
19 documents, depending on how the deposition
20 progresses, we may use as exhibits to your
21 deposition. I provided them to you in case it's
22 easier for you to open them up on your laptop in a
23 PDF, rather than just follow them when I put them
24 on the screen. So they're just provided there as
25 a convenience in case we need to reference them.

Page 10

1 A. Okay.

2 Q. Do you understand that?

3 A. Sure.

4 Q. Okay. Also, will you state your full
5 name for the record.

6 A. Diego Rodriguez.

7 Q. No middle name?

8 A. Diego Jesus Rodriguez.

9 Q. Thank you.

10 And what is your date of birth,
11 Mr. Rodriguez?

12 A. March 5, 1978.

13 Q. Thank you. And where do you reside?

14 A. In Florida.

15 Q. Could you give me your address?

16 A. It's the address you already have on
17 file.

18 Q. That's not accurate, sir. The address
19 we have on file is a virtual address. I'm asking
20 for where you reside.

21 A. Yeah. No, I object to that question.

22 Q. Why?

23 A. Because it's none of your business.

24 Q. Okay. Mr. Rodriguez, we need to know
25 your residence for a number of reasons. We're

Page 11

1 entitled to it. It's a simple background
2 question.

3 I will tell you this, if you have any
4 concerns about your address being disclosed
5 publically or things like that, I'm happy to
6 accommodate that.

7 But would you please answer the
8 question as to where you reside?

9 A. No, I object to that question.

10 Q. So you're refusing to answer where you
11 reside?

12 A. The address that you have is the only
13 address you're going to get.

14 Q. Do you reside at the address that I
15 have?

16 A. I don't live there.

17 Q. All right. Where are you now?

18 A. I'm in Mexico.

19 Q. Where in Mexico?

20 A. In Benito Juárez, Mexico.

21 Q. Where in Benito Juárez?

22 A. In Benito Juárez.

23 Q. Give me the address -- please identify
24 the address where you are in Benito Juárez.

25 A. I object to the question. It's not

Page 12

1 relevant.

2 Q. Why?

3 A. Because it's not relevant. Why do you
4 need to know where I am? It's irrelevant.

5 Q. How long have you been in
6 Benito Juárez?

7 A. Again, irrelevant.

8 Q. When did you get to Benito Juárez
9 recently?

10 A. Irrelevant.

11 Q. Why is it irrelevant, sir? You've made
12 several representations --

13 A. Why is it relevant? Why is it relevant
14 to you, is the question. Where I am on a Zoom
15 meeting is not relevant. I am here. If I was in
16 Timbuktu, it doesn't matter. I'm here on this
17 call, and so we should continue the deposition.

18 Q. When did you get to Benito Juárez, sir?

19 A. Again, I'm objecting because it's not
20 relevant to the deposition.

21 Q. It is relevant. Well, let me just
22 explain --

23 A. It's not relevant.

24 Q. Let me explain why I believe it's
25 relevant so that you can consider that before you

Page 13

1 continue to refuse to answer. All right?
2 It's relevant because you've made
3 several representations to me and to the Court as
4 to your residence that affect our ability to move
5 forward with this. We are concerned that you're
6 not being truthful or honest regarding your
7 location. You continue to be evasive about it,
8 which complicates and creates additional cost.
9 So, again, sir, would you tell me when
10 you got to Benito Juárez?

11 A. The answer to your question is that
12 none of what you just said is relevant to any
13 case. If there's anybody who is being untruthful,
14 Erik, it's you. I have a catalog and a list of
15 all of the lies you've told and all of the
16 documents you've submitted.

17 Where I'm physically located right now
18 is not relevant. And so when I get here and when
19 I leave and go and come back is not relevant at
20 all. But I do work down here in Mexico. And I
21 come, and I go, and I come, and I go.

22 And so when we have a deposition or if
23 we have a hearing and I happen to be in Florida,
24 I'll be logging in from Florida. If I happen to
25 be in Mexico, I'll be logging in from Mexico. If

Page 14

1 I happen to be in China, I'll be logging in from
2 China. But I will be at these hearings.
3 Q. All right. So just as a preliminary
4 question, hopefully, and then we'll move on and
5 I'll have to address it with the Court, are you
6 taking the position that you are never going to
7 share with me for the purposes of arranging
8 depositions and other events in this case where
9 you are residing?

10 A. You're never going to get any address
11 that belongs to me other than what you already
12 have.

13 Q. Okay. Are you ever going to be willing
14 to share where you're located so that we can
15 arrange depositions, most particularly yours, in
16 person?

17 A. I'm not going to share with you where
18 I'm at, at any particular point in time, no. It's
19 not relevant.

20 Q. So you're refusing to ever allow us to
21 take your deposition in person?

22 A. Not necessarily.

23 Q. Well, how are we going to do that, sir,
24 if you're not going to be willing to share where
25 you're located?

Page 15

1 A. Well, like I told you right now, I'm in
2 Benito Juárez. You could have set one up here,
3 but it's just as easy to do it over Zoom.

4 Is there any reason why you don't want
5 to do it over Zoom? Is this insufficient for you?
6 We've done it this way for two years in the state
7 of Idaho. So why is it, all of a sudden,
8 insufficient for you, Erik?

9 Q. Mr. Rodriguez, please just respond to
10 the questions.

11 So one more time --

12 A. I am responding to the question.

13 Q. Sir, Mr. Rodriguez, this is not
14 theater. Please just answer the questions.

15 Where are you located right now?

16 A. I already told you, and I'll tell you
17 again. I'm not going to tell you where I am in
18 terms of my address. I am in Mexico, period.

19 Q. Okay. And you will not give us your
20 residence in Florida; is that fair?

21 A. I'm not going to give you any address
22 that belongs to me other than that what you
23 already have.

24 Q. Mr. Rodriguez, are you on any
25 medication that would affect your ability to

Page 16

1 answer truthfully today?

2 A. No.

3 Q. Any other --

4 A. Are you on any medication, Erik, legal
5 or illegal? Are you taking any illegal drugs?

6 Q. Mr. Rodriguez, please just answer the
7 questions.

8 A. Please just answer my question. Are
9 you taking any illegal drugs?

10 Q. Mr. Rodriguez, that's not how this
11 process works. Please let me ask you the
12 questions.

13 A. Sure.

14 Q. Are there any other issues that affect
15 your ability to provide truthful and accurate
16 testimony today?

17 A. Nope.

18 Q. Okay. Mr. Rodriguez, can you just -- I
19 just want some background at a high level, and
20 then we can move on. We'll get into your
21 background in more detail in subsequent
22 depositions, but let me ask you this.

23 Have you graduated from high school?

24 A. Yes.

25 Q. Have you graduated from any secondary

1 institution?

2 A. Nope.

3 Q. So, Mr. Rodriguez, can you identify for
4 me each and every person who has any control
5 over -- strike that.

6 Can you identify for me any person who
7 has had any control over the FreedomMan.org
8 website during the period of 2021 to present?

9 A. It's just me. You don't even have to
10 say during the period. The only person who has
11 ever had access and control of it from the time it
12 began until now is just me.

13 Q. Okay. Can you identify for me -- I'm
14 going to have some follow-up questions on that.

15 A. Okay.

16 Q. But just to move through, can you
17 identify any person -- each and every person, I
18 should say, who has any ownership interest in the
19 FreedomMan.org website?

20 A. Just me.

21 Q. With regard to the ownership, is it --
22 is the website registered in your name?

23 A. It should be.

24 Q. Diego Rodriguez?

25 A. Yep.

1 Q. Okay. And there's no other -- no
2 payments received through subscription?

3 A. No, there's no subscriptions. You
4 can't pay to be a part of anything.

5 Q. Okay.

6 A. You can look at the website. We don't
7 have anybody running ads on there.

8 Q. Okay. Does FreedomMan.org allow folks
9 to donate to the Freedom Man PAC?

10 A. I'm sure we've made that request before
11 in the past. That would have been a long time ago
12 during the Butch Otter and Otter Care days. So
13 we're talking 2014. When was that, when Butch was
14 pushing Otter Care on everybody? 2012? 2014.

15 Q. Okay. So are you testifying that there
16 has been no request for donations made through the
17 FreedomMan.org website for the Freedom Man PAC
18 during the period of 2021 to present?

19 A. Not that I can remember, no.

20 Q. All right. Let me ask you about what
21 is represented to be Freedom Man Press.

22 First, what is Freedom Man Press?

23 A. It's just me. It is the name I use for
24 that website. That website is my personal blog.
25 I write about issues of constitutional rights. I

1 Q. Okay. And which entity do you register
2 the website through?

3 A. That's a good question. Probably
4 Bluehost, but maybe GoDaddy. No, that wouldn't be
5 GoDaddy. I'll have to follow up on that to give
6 you specifics. I don't remember. I have several
7 different registrars that I use for various for
8 web properties that I control.

9 Q. Okay. And who -- fair enough.
10 Just at this point in time, you can't
11 recall whether it is GoDaddy or another entity?

12 A. Correct. Correct. It's more likely
13 Bluehost than GoDaddy. I don't use GoDaddy for
14 that many. But I'll have to double-check.

15 Q. Would you agree to provide us that
16 information when you're able to check?

17 A. Absolutely, absolutely.

18 Q. All right. With regard to any revenue
19 generated by FreedomMan.org, who receives that?

20 A. Nobody receives any revenue because
21 there is no revenue generated by it.

22 Q. Well, it appears that there are ads
23 that are run on the Freedom Man website; is that
24 correct?

25 A. There are no ads on the website.

1 write about issues of freedom. It's my own
2 personal blog, and I call it Freedom Man Press
3 because we are taking our First Amendment right,
4 God-given right, to speak freely. And that is the
5 right of the press to speak freely. And so, hey,
6 we are Freedom Man Press, and that is me. That is
7 my blog and my website.

8 Q. So has there ever been any formal
9 entity, legal entity, that has been formed that
10 has been identified as Freedom Man Press?

11 A. No.

12 Q. Any steps ever taken to form an entity
13 that is --

14 A. No.

15 Q. -- Freedom Man Press LLC?

16 A. Nope.

17 Q. All right. And, again, Mr. Rodriguez,
18 I do have that tendency to pause in my questions.
19 So just do your best to let me get it out. I
20 apologize. I'll do my best to avoid it.

21 With regard to control of the website,
22 are you contending that -- I just want to make
23 sure I'm clear that no one else, other than you
24 and yourself, has ever had control of the website
25 ability, and I would include in that,

1 Mr. Rodriguez, the ability to upload any articles,
2 change any texts?

3 A. Nope, just me.

4 Q. Okay. So you are the only person who
5 has ever had the ability to change texts or upload
6 articles to the FreedomMan.org website; is that
7 correct?

8 A. That is correct.

9 Q. Are you the only person who has ever
10 provided content for the FreedomMan.org website?

11 A. I'm the only person who has provided
12 content for the FreedomMan.org website. However,
13 I have requested permission from other people who
14 have written articles from time to time that I
15 found valuable to post articles on my website.
16 Excuse me.

17 And so, yes, I have posted other
18 articles from other people on the website, but
19 it's always noted who that article is from, who it
20 was written by, and there's always a link to the
21 original source.

22 Q. Okay. So if this -- there's not an
23 identification on the article --

24 A. Then I wrote it. Sorry, I should let
25 you finish.

1 use?

2 A. It's RapidWeaver.

3 Q. Okay. Mr. Rodriguez, I'm going to
4 share -- try to do my best to share a screenshot
5 with you here in a second.

6 A. Okay.

7 Q. I'm a little clumsy with this. So
8 please be as patient as you can.

9 Mr. Rodriguez, if I have done it
10 properly, you should have a share-screen that
11 identifies the Freedom Man privacy policy.

12 Do you see that, sir?

13 A. Yeah.

14 Q. All right. So I'll represent to you
15 that this is a screenshot that was obtained from
16 the Freedom Man website relating to the privacy
17 policy.

18 A. Okay.

19 Q. And it has three pages on the document.

20 I'm happy to provide it to you in a PDF form if
21 you need it that way. But if you can see it
22 clearly now, I would like to proceed and ask you a
23 couple questions.

24 A. Yep, I can see it.

25 Q. Are you familiar with this screenshot

1 Q. Yeah. And, again, we just need to make
2 sure the transcript is clean so we can avoid
3 having to do this again.

4 So am I understanding correctly that if
5 there is an article and there's no identification
6 as to who might have written that article or that
7 text, you would be the responsible party?

8 A. Yes.

9 Q. Okay. Do you know what type of
10 platform the FreedomMan.org website works on?

11 A. It's called RapidWeaver.

12 Q. And are you the individual who actually
13 goes in and uses the software and uses the
14 platform to make changes?

15 A. Yes.

16 Q. So, Mr. Rodriguez, is there ever
17 another person, a third party, and I'm asking just
18 kind of administratively, who does the
19 administration of modifying the website other than
20 yourself?

21 A. No. Nope, just me.

22 Q. Okay. And is that the only -- well,
23 let me make sure I understand your response.

24 If I were to ask you what software you
25 use to control the website, what software do you

1 on the website, the Freedom Man privacy policy?

2 A. Yep.

3 Q. Okay. And did you write the privacy
4 policy?

5 A. No. I used some boilerplate software.
6 There's some software you can go on the Internet
7 and tell them to make a privacy policy for you.
8 And you just input some basic data, and then they
9 spit it out, and then you post it.

10 Q. Okay. So --

11 A. I'm not a legal guru. So I don't know
12 how to write legal stuff.

13 Q. Okay. So I direct your attention, if I
14 could -- and by the way, we're going to mark this
15 as Exhibit 1 to your deposition. All right?

16 A. Okay.

17 (Exhibit 1 marked.)

18 Q. The way things will go is subsequent
19 deposition exhibits will just be numbered and
20 then, of course, be sequential. Okay?

21 A. Okay.

22 Q. Okay. So taking a look at what we've
23 agreed to mark as Exhibit 1, it's the Freedom Man
24 website privacy policy; correct?

25 A. Um-hmm. Yes.

1 Q. When I look at the first page there, it
2 states in the second sentence, "This website is
3 wholly owned by Freedom Man Press LLC."

4 Do you see that?

5 A. Yes.

6 Q. Okay.

7 A. So it must be how I filled it out when
8 I filled out the form.

9 Q. Okay. So just so the record is clear,
10 is that a false statement that this --

11 A. It's an incorrect statement because
12 there is no existing Freedom Man Press LLC. But
13 that must have been how I filled out the original
14 form when I was creating a privacy policy.

15 Q. Okay. And then it continues on, it
16 makes another reference to --

17 A. Yes, so that needed to be updated
18 because it doesn't exist. Freedom Man LLC doesn't
19 exist -- or Freedom Man Press LLC doesn't exist.

20 Q. Mr. Rodriguez, let me get my question
21 out so we're not talking over one another. Okay?

22 A. Okay.

23 Q. All right. So is it fair to say that
24 there are no -- and I'm looking at this last
25 sentence in the second paragraph, that there are

1 Q. Okay. And the first -- we're going to
2 mark this as Exhibit 2 to your deposition.

3 (Exhibit 2 marked.)

4 The first page is some material
5 identifying how the screenshot was captured and
6 when.

7 But if I could direct your attention to
8 the next page, do you see where it says
9 "Freedom Man Press"? Do you see that, sir?

10 A. "About Freedom Man Press"? Yes, sir.

11 Q. "About Freedom Man Press"?

12 A. Yep.

13 Q. And do you recognize this as a
14 screenshot from the Freedom Man website that you
15 operate?

16 A. Yes, I do. Excuse me.

17 Q. Okay. If we look on there as
18 Freedom Man staff on this website -- excuse me,
19 this web page, it identifies Diego Rodriguez as
20 communications and marketing director.

21 Is that you?

22 A. Yep, yep.

23 Q. Okay. It identifies a Gunner Steele,
24 staff columnist.

25 Who is Gunner Steele?

1 no services offered by any entity called
2 Freedom Man LLC?

3 A. No, there's no services offered by
4 Freedom Man LLC other than just providing
5 information on that blog that is free to the
6 public.

7 Q. Okay. And, again, Freedom Man LLC,
8 just so we're clear, never was and never has been
9 an entity?

10 A. No, neither Freedom Man Press LLC nor
11 Freedom Man LLC.

12 Q. Is it fair to say that there is no such
13 organization called Freedom Man Press?

14 A. It's fair to say that. Yeah. I am
15 Freedom Man Press. I am Freedom Man. I am
16 Freedom Man Press. I am FreedomMan.org. I'm all
17 of those.

18 Q. Okay. I would like to put up another
19 document for us.

20 A. Okay.

21 Q. Tell me when this is up on the share
22 screen.

23 Do you see a document up on the screen,
24 sir?

25 A. Yep.

1 A. Yep. That's a pseudonym that I use to
2 write articles. Such is me.

3 Q. Okay. And then the next name is -- and
4 I apologize. I don't want to mispronounce it.

5 Would you pronounce -- and I believe
6 that's your --

7 A. Micaiah.

8 Q. And how do you pronounce the last name?

9 A. Micaiah Chavoya.

10 Q. And Ms. Chavoya --

11 A. No, it's a dude. It's my son.

12 Q. Okay. Sorry.

13 So Mr. Chavoya, who is he?

14 A. He's my son.

15 Q. Okay. And how old is he?

16 A. He just turned 18.

17 Q. Okay. And what role does he have at
18 the Freedom Man website?

19 A. Nothing. He just helps us at events
20 and things like that. So we have events from time
21 to time. So, you know, we've participated in many
22 events there at the Capitol, for example, when we
23 were protesting against the unlawful use of face
24 masks from the governor, et cetera. He helps out.
25 He's my son.

1 action of the website?

2 A. Not of the website, but just part of
3 Freedom Man as a group. Like I said earlier in
4 the deposition, one of the things that we do often
5 is we have events that we hold. And we have these
6 events at the Capitol, at wherever, and my family
7 assists me with putting on those events. They
8 assist me with the sound system. They assist me
9 with setting things up, et cetera. And so, yeah,
10 we put his name on there as an ambassador for
11 action.

12 Q. So at any point in time, did
13 Mr. Anderson have any input regarding the content
14 or subject matter of the FreedomMan.org website?

15 A. Never once.

16 Q. Okay. Has he ever provided any content
17 of any kind for the Freedom Man website?

18 A. No. No, he has not.

19 Q. So, Mr. Rodriguez, I have attempted to
20 share the screen again.

21 A. Yeah.

22 Q. Do you see where it says "Freedom Man,
23 About Freedom Man Press"?

24 A. Yep.

25 Q. It's a five-page document that contains

1 Freedom Man staff member?

2 A. It was nothing. He never had any
3 control over any of the content or anything. He
4 was just a figure name that we used on the website
5 because he participated with us in many events
6 that we held.

7 Q. Okay. So, again -- and, again, I'm
8 just trying to make sure we're clear so we can
9 move forward in this litigation.

10 Are you testifying that Mr. Anderson at
11 no point in time, despite having the title of
12 executor director, despite you having placed that
13 on the website that you control, at no point in
14 time did Mr. Anderson have any substantive role
15 with Freedom Man Press?

16 A. At no time did he have any substantive
17 role. At no time did he create any content, post
18 any content, or have any access to the
19 FreedomMan.org website in any way, shape or form.

20 Q. So I'll represent to you -- but I don't
21 want to take too much time on this deposition.
22 We're going to have plenty of deposition time
23 later on, I think, as this litigation progresses.
24 I'll represent to you that I believe I have seen
25 columns posted on the FreedomMan.org website that

1 screen content from the FreedomMan.org website.
2 We're going to mark this Exhibit 4 to your
3 deposition.

4 A. Okay.
5 (Exhibit 4 marked.)

6 Q. Does this look like a true and accurate
7 printout of content from the website?

8 A. Yeah, it looks like it's missing some
9 info, like kind of a big blank page. But, yeah.

10 Q. I'll represent to you that that's just
11 a function of printing out the screen that it
12 printed out.

13 A. Okay, gotcha.

14 Q. So if you take a look here, what is
15 page 3 of what we're marking as Exhibit 4 to your
16 deposition, you'll see identified on the website
17 is Levi Anderson as executive director?

18 A. Yep.

19 Q. Okay. Is it fair to say that you
20 control the content and you're the one who
21 identified Mr. Anderson as executive director on
22 the website?

23 A. Yes, that is fair to say.

24 Q. Okay. What was Mr. Anderson's role as
25 executive director of the Freedom Man -- as a

1 have in their byline Mr. Anderson.

2 If I'm accurate and that there are
3 articles that have in their byline as being
4 written by Mr. Anderson, are you testifying that
5 would be false or incorrect?

6 A. It would be incorrect in the sense that
7 if it was posted with his name on it, then he
8 allowed it to happen, but it was ghost written by
9 me.

10 Q. Okay. What was the purpose of having
11 an article listed as having been written by
12 Mr. Anderson when, in fact, you had written it?

13 A. I don't know. I would have to see the
14 article to remind myself of what the reason for it
15 was.

16 Q. Okay. Fair enough.

17 Let me ask you this so we can get more
18 focused on -- try to focus the question more on
19 what's kind of before us in this lawsuit.

20 At any point in time, has anyone
21 provided any content relating to the issues with
22 St. Luke's other than yourself?

23 A. Nope, just me.

24 MR. STIDHAM: Madam Court Reporter, I want
25 to make sure my count is correct.

1 Next would be No. 5?
 2 THE REPORTER: Correct.
 3 MR. STIDHAM: Thank you.
 4 BY MR. STIDHAM:
 5 Q. So let me ask you -- move on to
 6 different topic or different general category of
 7 interrogatories, Mr. Rodriguez.
 8 Can you identify for me, what was the
 9 principal place of business for Freedom Man Press?
 10 A. There is no principal -- go ahead,
 11 finish.
 12 Q. During the period of 2021?
 13 A. There was no principal place of
 14 business other than just me and my laptop.
 15 Wherever I happen to be and wherever I am with my
 16 laptop, that's the place of business.
 17 Q. So there was -- and we can go back to
 18 it, if you want. There was -- a number of times,
 19 there was a State Street address in Boise
 20 identified as the address for Freedom Man Press.
 21 A. Sure.
 22 Q. What is that associated with?
 23 A. That's just a PO box that I have.
 24 Q. Okay. So how long did Freedom Man
 25 Press and/or the FreedomMan.org website use the

1 responsible for identifying address and contact
 2 information for the FreedomMan.org website?
 3 A. Yes.
 4 Q. You had indicated previously,
 5 Mr. Rodriguez, that FreedomMan.org is your
 6 personal blog and been used in the past to promote
 7 the positions of Freedom Man PAC.
 8 A. Sure.
 9 Q. Which is a political-based action
 10 committee that you were in charge of that no
 11 longer exists; is that correct?
 12 A. That is correct.
 13 Q. Okay. When did Freedom Man PAC cease
 14 to exist?
 15 A. Once I moved out of Idaho.
 16 Q. Did you formally close the political
 17 action committee?
 18 A. Yes.
 19 Q. So would you identify for me any person
 20 who wrote, authored, edited, or otherwise
 21 contributed any information, any support for
 22 content relating to Natasha Erickson that was
 23 posted on the FreedomMan.org website.
 24 A. Anything posted on there was written by
 25 me.

1 State Street, Boise address?
 2 A. I couldn't tell you off the top of my
 3 head.
 4 Q. Can you give me just an estimate of
 5 time?
 6 A. No.
 7 Q. Okay.
 8 A. I can look it up and give you the exact
 9 date if you want to add that to things I need to
 10 get back to you on.
 11 Q. Well, we're going to have some
 12 documents that might help us with timeframe, but
 13 we can follow it up.
 14 A. Okay.
 15 Q. And, again, sir, I'm just asking you
 16 for your estimate or your best understanding. Let
 17 me ask that one more time.
 18 A. Again, off the top of my head, I
 19 wouldn't know what to tell you.
 20 Q. Okay. At any point in time, have you
 21 changed the address for Freedom Man Press or the
 22 FreedomMan.org website from the State Street
 23 address?
 24 A. I don't remember.
 25 Q. Okay. Are you the individual who is

1 Q. Well, let me break that down because I
 2 think there's some additional components to that
 3 question, and I want to ask some a little bit more
 4 specifically. But I appreciate your general
 5 answer. Let me focus on this part, contributed to
 6 content related to Natasha Erickson.
 7 Did anyone, other than yourself,
 8 contribute in any way to the content that was
 9 posted relating to Dr. Erickson on the Freedom Man
 10 website?
 11 A. I don't understand how that question is
 12 different from the question you just asked before.
 13 Everything that's on there about Natasha Erickson,
 14 Dr. Natasha Erickson, I wrote. So 100 percent of
 15 it was written by me, penned by my hand, posted by
 16 me, all of it. So that's the same question you
 17 asked previously. I don't understand the
 18 difference now.
 19 Q. Well, I appreciate you asking for the
 20 clarification. So I'm going to go through kind of
 21 how some of these -- how the question was broken
 22 out in the interrogatory, and we can focus on
 23 those pieces. I think, if I understand you
 24 correctly, I understand your answer except for
 25 "contributed," which we'll get to at the end.

1 The first part is any person that wrote
2 an article regarding Natasha Erickson on the
3 Freedom Man website, that was you; correct?

4 A. Correct.

5 Q. Okay. Any person that authored any
6 content relating to Dr. Natasha Erickson on the
7 website, that was you; correct?

8 A. Correct.

9 Q. Any person that edited any content
10 relating to Dr. Natasha Erickson on the
11 Freedom Man website, that was you; correct?

12 A. Correct.

13 Q. And then this is the component, sir,
14 that I wanted to make sure I'm understanding your
15 answer to, and that is "otherwise contributed
16 content." So what I am trying to understand
17 there, let me try to rephrase it. Hopefully, we
18 can be communicating a little bit more directly.

19 Did anyone, other than yourself,
20 provide the information or evidence that you
21 relied upon in writing any content relating to
22 Dr. Erickson that was posted on the Freedom Man
23 website?

24 A. Okay. To that, yes.

25 Q. Okay. Who did?

1 you should have on your screen what we're going to
2 be marking Exhibit 5 to your deposition. And
3 that's some screen content from the FreedomMan.org
4 website with the heading "People responsible for
5 Cyrus's kidnapping."

6 Do you see that?

7 A. Yes, I do.

8 Q. Let me just scroll through it a little
9 bit so you have a chance to see it. This is
10 page 1. The heading, again, says "People
11 responsible for Cyrus's kidnapping." And then
12 you've got a heading down here -- excuse me,
13 you've got it in a parenthetical, the reference
14 "child trafficking ring."

15 Do you see that?

16 A. Yep. Yes, I do.

17 Q. Okay. And I'm correct in understanding
18 that you're the one who generated the phrase
19 "People responsible for Cyrus's kidnapping";
20 correct?

21 A. Yes, I am.

22 Q. Okay. You are the one who generated
23 and wrote here "child trafficking ring"; correct?

24 A. That is correct.

25 Q. Okay. And then if we go a little bit

1 A. So that would be my family. That would
2 be my son-in-law, my daughter, those who actually
3 directly interfaced with Dr. Natasha Erickson.
4 They were the ones who were mistreated by her,
5 threatened by her, et cetera. And they're the
6 ones who shared their story with me that I
7 repeated and posted.

8 Q. Okay. So let me just make sure I've
9 got the entire universe or set of people that
10 provided you information that contributed to the
11 content that you wrote regarding Dr. Erickson.

12 Am I correct in understanding that your
13 daughter and your son-in-law are the only
14 individuals that provided you any information that
15 you relied on in generating the content relating
16 to Dr. Erickson that was posted on the Freedom Man
17 website?

18 A. That is correct. It was my daughter,
19 Marissa Anderson, and my son-in-law,
20 Levi Anderson.

21 Q. I'm going to share a screen again,
22 Mr. Rodriguez. Give me a moment.

23 A. Okay.

24 (Exhibit 5 marked.)

25 Q. Mr. Rodriguez, if it worked correctly

1 further down the page, it says "Main people
2 responsible for baby Cyrus's kidnapping."

3 Do you see that?

4 A. "The main people," yeah.

5 Q. Okay. Thank you for that correction.

6 And then you placed immediately below
7 that heading a picture of Dr. Erickson; correct?

8 A. Yep.

9 Q. Okay. And you're the one who did that?

10 A. Yep.

11 Q. Okay. And then, also, you posted a
12 link relating to Dr. Erickson there; correct?

13 A. Yep. Everything on there, on that
14 entire page from Dr. Erickson all the way down to
15 everybody else on that page, I posted all of their
16 information.

17 Q. Okay. All right. So this is -- I just
18 want to make sure we've got a sense for the
19 exhibit.

20 Below Dr. Erickson, you posted --
21 you're the individual who posted a picture of
22 Judge Fortier and wrote, "She's the unjust judge";
23 correct?

24 A. Correct.

25 Q. And you wrote that "she's disgusting";

1 correct?

2 A. Yep. Yes. Everybody, all those folks,
3 you can keep going down the list.

4 Q. Okay. Just -- and I will go quick.

5 We'll have a chance to talk about this more in
6 other depositions.

7 So, just so we can make sure we
8 identify the exhibit, there's Mr. Dykstra
9 identified and then Ms. Loufoua, a social worker;
10 correct?

11 A. Correct.

12 Q. And then if you get to page 3 of the
13 exhibit, there's police Detective Hansen, police
14 Detective Fuller, and then starting -- and
15 continuing on to page 4 is Sergeant McGilvery;
16 correct?

17 A. Yep.

18 Q. Officer King, and then you posted a
19 video; correct?

20 A. Correct.

21 Q. Okay. All right. So at the risk of
22 belaboring it, you were 100-percent responsible
23 for all of that; correct?

24 A. Yes, I was.

25 Q. Getting back to the question I had

1 that from, it was from Marissa and Levi who told
2 me their experience while they were there at
3 St. Luke's hospital with Dr. Erickson.

4 I did not have firsthand knowledge of
5 that experience with Natasha Erickson, if that's
6 what you're asking. No, I did not. I was relying
7 on the story told to me by my daughter and
8 son-in-law, who I trust completely.

9 Q. Okay. Did they -- let me break down
10 the components of this phrase -- or this first
11 sentence. Excuse me.

12 The first part where she says she was
13 the first to call CPS, do you see that?

14 A. Yep. She threatened to call CPS if
15 they were going to leave against AMA, against
16 medical advice. So they decided to stay simply
17 because they were threatened by
18 Dr. Natasha Erickson. And the next day, CPS
19 showed up anyway.

20 Q. So here's my question, sir. I'm just
21 trying to understand.

22 Did Marissa or Levi tell you that
23 Dr. Erickson was the first one to call CPS
24 regarding their child?

25 A. They told me that she was the first one

1 asked before about contributing to the content,
2 did you rely upon any contributions for this --
3 for the content that's stated here, "Cyrus's
4 kidnapping"?

5 A. No. No, I did not rely on anybody
6 other than myself.

7 Q. Okay. And then this language here, I'm
8 scrolling down to the middle of page 1, Exhibit 5,
9 Dr. Erickson, you state she was the first to call
10 CPS simply because Marissa and Levi asked to leave
11 St. Luke's after Cyrus first got his IV and was
12 rehydrated.

13 See that?

14 A. Yep.

15 Q. Did you rely upon any individuals for
16 that fact?

17 A. Yeah, Marissa and Levi told me that.
18 Everything you see right there is exactly what
19 they said. It's exactly what she did to them.

20 Q. Okay. So was -- who, if anyone, did
21 you rely upon for this first part here, where you
22 say she was the first to call CPS?

23 A. What do you mean? I just told you. So
24 everything you see right there, I wrote. But if
25 you're asking where I got the information to write

1 to threaten to call CPS, which she did do. And
2 they stayed out of fear of having CPS called on
3 their child, because anybody who knows CPS, that
4 it is a child trafficking ring and nobody wants to
5 get involved with them. And the next day after
6 threatening, sure enough, the CPS case worker who
7 resides there in St. Luke's hospital came to
8 interview Marissa the day after she threatened
9 them.

10 Q. Okay. So, just so we're clear here, in
11 response to the question who you relied upon for
12 content, if I'm understanding correctly, you're
13 stating Marissa and Levi informed you that --
14 according to you, that they were threatened by
15 Dr. Erickson that she was going to call CPS;
16 correct?

17 A. Not only that. That is correct. But
18 the next day, CPS did come to interview Marissa.

19 Q. Okay. So is it fair to say you don't
20 have any factual basis to state as a fact that
21 Dr. Erickson was the first one to call CPS?

22 A. I have a factual basis based on the
23 testimony of my daughter and son-in-law. So if we
24 are to admit the testimony of trusted individuals
25 as factual, then, yes, I have that factual basis.

1 watch with CPS; correct?

2 A. Well, you see that in quotes. And for
3 anyone who has worked with CPS before, you know as
4 soon as CPS gets their eyes on a child, they're
5 now on watch and CPS is now ready to strike to
6 take that child away at first opportunity.

7 So that's why "watch" is there in
8 quotation marks. I'm not claiming that that is
9 some type of specific term, but that is what CPS
10 does. And so once CPS has alerted to a child that
11 can come under their purview, then, yeah, that's
12 what gets the whole ball rolling in CPS cases.

13 Q. Okay. So you -- but here's my
14 question, sir, that was different than that.

15 You're stating here affirmatively, are
16 you not, on your website, that Dr. Erickson put
17 Marissa and Levi on, quote/unquote, "watch" with
18 CPS; correct?

19 A. Yes, I am stating that. According to
20 everything I know, everything I wrote there, I
21 believe it wholeheartedly to be true.

22 Q. Okay. And, again, I want to separate
23 your belief and what you are asserting that you
24 know versus what you have facts for.

25 Isn't it fair to say -- well, and let

1 trigger." Okay. Yeah, I see it. Yes, that is
2 correct.

3 Q. So let's back up because we talked over
4 each other and the record might be a little bit
5 unclear. I'm going to bring your attention to the
6 last sentence of the parenthetical under
7 "Dr. Erickson" in Exhibit 5. Okay?

8 A. Okay.

9 Q. And there's the word "this" there;
10 correct?

11 A. Um-hmm.

12 Q. Okay. Am I correct in understanding
13 that when -- what you're contending with regard to
14 the use of "this," is you're referring to the
15 factual representation you made that Dr. Erickson
16 was the first to call CPS and that she was the one
17 who put Marissa and Levi on watch with CPS?

18 A. Yes, that is correct.

19 Q. Okay. And then you go on to write that
20 this was the initial trigger that got everything
21 started; correct?

22 A. Correct.

23 Q. Is it fair to say that you're
24 representing to your viewerships that Dr. Erickson
25 is the person who started all of the events that

1 me back up.

2 I appreciate what you're saying on --
3 or I hear what you're saying regarding logical
4 deductions and assumptions.

5 But just so the record is clear, you do
6 not have any direct evidence from any source,
7 including Levi and Marissa, that indicates that
8 Dr. Erickson put Marissa and Levi on any kind of
9 watch with CPS, do you?

10 A. How could I? How could I be the
11 one who -- I'm not the NSA, who taps people's
12 phone lines and can follow their every single move
13 and communication.

14 Q. Fair enough. So next question.

15 You state "this," and I understand that
16 you're referring to your factual assertion that
17 Dr. Erickson was the first person to call CPS and
18 that Dr. Erickson put Marissa and Levi on watch
19 with CPS.

20 That's what you're referring to as
21 "this"; correct?

22 A. What do you mean by "this"?

23 Q. In the last sentence.

24 A. Oh, the very first sentence. I see it
25 there, yeah. Yes. "This was the initial

1 led to the infant being taken into custody by CPS?

2 A. So when you just -- the way you just
3 said it right now, no, I disagree with that. I'm
4 not saying she was the one who started all of the
5 events. But I'm saying she got the first event
6 started. She's the one who knocked the snowball
7 off the top of the hill, not necessarily the one
8 who made any subsequent decisions after the fact.
9 But in terms of this entire thing coming under the
10 purview of CPS, yes, absolutely, I am stating that
11 she is the one responsible for getting that ball
12 started or triggering the entire process. Yes,
13 that I am saying.

14 Q. And that she is -- because of that, you
15 are identifying her to your followers as somebody
16 responsible for Cyrus's kidnapping?

17 A. Yes, correct.

18 Q. And you are identifying her to your
19 followers as a participant in a child trafficking
20 ring?

21 A. Anybody who is turning children over to
22 CPS --

23 Q. Sir --

24 A. Anybody who is turning children over to
25 CPS is definitely a part of the child trafficking

1 ring.

2 Q. Mr. Rodriguez, please just respond to
3 the question as it's raised. You are identifying
4 here Miss -- or, excuse me, Dr. Erickson as a
5 participant in a child trafficking ring; correct?

6 A. Correct, because she is turning
7 children over to CPS.

8 Q. Okay. Again, just answer the question
9 as asked. You are --

10 A. I'm answering the question completely.
11 I understand you don't like the answer. But I'm
12 going to answer the question properly and directly
13 as it was stated to me. I answered it. So if you
14 don't like the answer, that's your problem.

15 Q. No, Mr. Rodriguez, it's not my problem.
16 It's your problem because you're going to waste a
17 lot of our time if you don't answer directly.

18 A. I did answer the question directly.

19 Q. Listen again, sir, please.

20 You're writing here that Dr. Erickson
21 is a participant in, your words, a child
22 trafficking ring here in Idaho; is that correct?

23 A. That is correct, like I already stated.

24 Q. All right. Give me a second,
25 Mr. Rodriguez, and I have another article just to

1 Q. Okay. And then you say, "Child
2 trafficker profile, Dr. Natasha Erickson."

3 A. Yep.

4 Q. You see that? And you came up with
5 that content; correct?

6 A. Yes.

7 Q. Okay. So I'm scrolling down the
8 exhibit, and we should be on page 2 of 6.

9 Do you see that?

10 A. Yep.

11 Q. And to back up, does this look to be a
12 true and accurate reflection of content that you
13 posted on the FreedomMan.org website?

14 A. Yes. I mean, it's a little janky
15 because, as you said, with the nature of capturing
16 a screenshot. But that's fine. It is the
17 content, nevertheless.

18 Q. Okay. Fair enough.

19 And, again, I'm on the bottom of what
20 is page 2 of this printout of the screen. And at
21 the top, it says, "Child trafficker profile,
22 Dr. Natasha Erickson."

23 Do you see that?

24 A. Yes.

25 Q. Okay. And for this statement, "Child

1 ask you some questions about so we can -- hold on
2 for just a second, sir.

3 So, Mr. Rodriguez, what we're going to
4 mark as Exhibit 6 to your deposition should be up
5 on the screen.

6 (Exhibit 6 marked.)

7 A. Okay.

8 Q. Do you see -- hopefully, you see some
9 content from the website you control, and it has
10 got some skulls and then pictures of some
11 individuals.

12 Below that, it says "Child trafficker
13 profile, Dr. Natasha Erickson"; correct?

14 A. Yep.

15 Q. Okay. And did you come up with these
16 graphics?

17 A. Yep.

18 Q. Okay. And you're linking Dr. Erickson
19 with these other individuals as participating in a
20 child trafficking ring; correct?

21 A. I'm not necessarily linking them to her
22 or her to them directly as them being like they
23 know one another and conspire. However, I am
24 linking them as all being a part of what I am
25 calling the child trafficking ring in Idaho, yes.

1 trafficker profile," did you rely upon anybody
2 else to contribute to that?

3 A. No, I wrote that.

4 Q. Okay. So if we look over to the side
5 of the picture, you've got Dr. Erickson's name,
6 and you say, "St. Luke's doctor," and you've
7 provided a link to her profile on the St. Luke's
8 website; correct?

9 A. Yep.

10 Q. Okay. And then you write in the
11 parenthetical, "She was the first to treat Marissa
12 and Levi with hostility because Cyrus was
13 unvaccinated and because they asked to leave
14 St. Luke's after Cyrus got his first IV and was
15 rehydrated."

16 Do you see that?

17 A. Yep.

18 Q. Okay. Did you rely upon anybody else
19 to contribute to the support or content of that
20 statement?

21 A. Yes. As you know, I spoke to
22 Marissa Anderson and Levi Anderson, my daughter
23 and son-in-law, who shared their experience with
24 me. And I used their experience to craft this
25 content.

1 Q. Anybody else that you relied on other
2 than Marissa and Levi?

3 A. No.

4 Q. Okay. You then go on in this area, and
5 you state, "She threatened to call CPS if they
6 decided to leave early. So Levi and Marissa
7 stayed under threat."

8 Do you see that?

9 A. I'm sorry, say it again.

10 Q. Do you see this section, sir, that
11 begins here at the top of what is page 3, "Cyrus
12 first got his IV," and it continues --

13 A. Yep.

14 Q. It continues on to the last sentence
15 that is, "This was the initial trigger that got
16 everything started."

17 Do you see that?

18 A. Yes.

19 Q. Okay. Did you rely upon any
20 information, other than Levi and Marissa, relating
21 to that?

22 A. Nope.

23 Q. Okay. And then you provide another
24 link to Dr. Erickson there; correct?

25 A. Yes.

1 After having identified Dr. Erickson as
2 a child trafficker on your website, you posted
3 information from St. Luke's regarding where she
4 works and her phone number; correct?

5 A. I posted her profile from the
6 St. Luke's website, which you are looking at and I
7 am looking at right now at the same time.

8 Q. All right.

9 A. It has her picture. It has where she
10 works. It has the address of the hospital. It
11 has her phone and fax, which I'm assuming are her
12 office. You scroll down, it has her biography,
13 et cetera, et cetera. It is St. Luke's public
14 profile of Dr. Natasha Erickson. So I am posting
15 information that is already public, yes.

16 Q. Okay. Please listen to the entire
17 question. I just want to get a clean answer.

18 After identifying her on the web page
19 as being a child trafficker, you placed on the web
20 page information regarding what Dr. Erickson looks
21 like, where she works, and related work phone
22 numbers for her; correct?

23 A. I posted her public profile from
24 St. Luke's hospital, correct.

25 Q. Immediately below where you called her

1 Q. After having identified her as a child
2 trafficker; correct?

3 A. Correct.

4 Q. Okay. Then you provide some
5 information regarding phone numbers relating to
6 Dr. Erickson after having identified her as a
7 child trafficker; correct?

8 A. What I have there is what I provided,
9 is a screenshot from her page.

10 Q. Sir, please answer my question.

11 A. Well, you asked an inappropriate
12 question. So the question you asked -- and I
13 object to the way you asked the question because
14 it's inappropriate.

15 So if we're looking at the same
16 exhibit, which we should be looking at, yes, I
17 copied and pasted her profile page from
18 St. Luke's. There's a screenshot of it. And that
19 is exactly what I pasted. Whatever the content
20 that is on there, that is the content that comes
21 from St. Luke's hospital. So what I posted was
22 St. Luke's profile of Natasha Erickson.

23 Q. Maybe you didn't hear my question, sir.
24 We might have talked over each other. Here was
25 the question. I'll say it again.

1 a child trafficker; correct?

2 A. That is correct. That is correct.

3 Q. Okay. And then if we continue down the
4 page, after identifying folks as child
5 traffickers, you placed on the website a donation
6 button; correct?

7 A. Well, your screenshot there is messed
8 up. So at the time of baby Cyrus's kidnapping,
9 there was a donate button on the right side of
10 every page. So it wasn't immediately below it.
11 It was to the right, off on what's called the side
12 bar. But, yes.

13 Q. Okay. So I appreciate it. Let me
14 rephrase it with your clarification about how the
15 website was set up.

16 After posting information identifying
17 Dr. Erickson and others as child traffickers, you
18 placed on that same web page a solicitation for
19 donations; correct?

20 A. So, no, I wouldn't say it was just --
21 so the answer to that is yes, but let's clarify it
22 because the donation button to donate to baby
23 Cyrus's cause is on every single page of the baby
24 Cyrus section of that website. So to state it the
25 way you stated it sounds, you know, disingenuous

Page 69

1 what you're referring to, at least what I'm
2 inferring from the face that you made.

3 Those ads are part of Disqus. So
4 Disqus is the commenting system.

5 **Q. I'm going to interrupt you. I'm happy
6 to ask some questions along those lines. It's
7 hard to use your testimony if it's not in
8 conjunction with a question.**

9 A. No problem. Anyway, you can ask that
10 question later, then. But now I have the
11 clarification for what the confusion was there.

12 **Q. Okay. Let me ask you some questions
13 along those lines, too, so we can maybe clear it
14 up.**

15 **So, Mr. Rodriguez, after the break, you
16 were sharing that you had gone back on and
17 reviewed the website.**

18 **And you identified some advertising
19 related to the website when you reviewed it during
20 the break; is that correct?**

21 A. That is correct.

22 **Q. And you indicated you wanted to explain
23 that as it relates to the question of whether or
24 not there's revenue generated by the website.**

25 **So you can go ahead and explain that**

Page 70

1 **for us, sir.**

2 A. Yeah. So there's definitely zero
3 revenue generated by the website, but those ads do
4 appear. And the reason those ads appear is
5 because we use a commenting system called Disqus,
6 spelled D-i-s-q-u-s. And in order to place their
7 software on our website which allows people to
8 post comments, you can either pay for the software
9 or you don't pay for the software. And if you
10 don't pay for the software, they will place ads
11 underneath or in the commenting section that they
12 gain revenue from in exchange for allowing me to
13 use their software for free.

14 **Q. Okay. And just off the top of your
15 head, do you have a ballpark what the difference
16 is between paying for the software and not having
17 the ads, versus accepting the software and
18 allowing them to place ads?**

19 A. Ballpark, no. It's a couple-hundred
20 bucks. Whatever it is, I'm too cheap to want to
21 pay for it. So, no. Again, I can get you that
22 very specific number. I'll put that on the list,
23 and I will tell you exactly what it would cost me
24 on an annual basis so that the ads don't appear.

25 **Q. Okay. And just one last question to**

Page 71

1 **make sure that I'm understanding.**

2 **Does this modify your prior answer, in
3 that you testified that you receive -- that,
4 excuse me, no one receives any revenue directly
5 associated with ads being placed on the
6 FreedomMan.org website?**

7 A. I don't receive any revenue. Nobody
8 associated with me receives any revenue. But does
9 Disqus, as a company, receive revenue? Probably.

10 **Q. Okay. Thank you for that
11 clarification.**

12 **Okay. Let me ask you some questions
13 here relating to Interrogatory No. 4.**

14 A. Okay.

15 **Q. Can you identify any person who has
16 posted -- any person other than yourself, let's
17 ask it that way, who has posted any content on the
18 FreedomMan.org website?**

19 A. Nobody has posted any content other
20 than me.

21 **Q. Okay. Any person who has published
22 content on the FreedomMan.org website?**

23 A. Like I mentioned before, there are
24 people who I've got permission from them to post
25 their articles on the website. But if that is so,

Page 72

1 they are always noted on there, like this is the
2 author and this is the link to their original
3 content.

4 **Q. And let me ask it just so it's tied
5 more to the issues in this lawsuit.**

6 **Are you aware of any person having
7 their content published that relates to the
8 lawsuit -- the issues that are the subject of the
9 lawsuit with St. Luke's?**

10 A. No.

11 **Q. Okay. Anyone other than yourself who
12 is authorized or capable of removing content from
13 FreedomMan.org?**

14 A. No. There's nobody other than myself.

15 **Q. Okay. This is -- let me ask you this
16 question that was Interrogatory No. 5. Some of
17 it, I think, is addressed by your representation
18 that Freedom Man Press is not a legal entity of
19 any kind.**

20 A. Correct, it is not.

21 **Q. Is it fair to say that for purposes of
22 legal liability which would -- and/or receiving
23 discovery or legal process relating to the
24 FreedomMan.org website, you are the person?**

25 A. That is correct.

1 Q. Your identified role relating to
2 Freedom Man Press is -- one of your identified
3 roles is as marketing director.

4 A. Yeah, sure.

5 Q. Can you explain to me what that role
6 is?

7 A. Well, it's just a title. There's not
8 an actual role. Again, Freedom Man Press, if you
9 want to call it Freedom Man Press, if you want to
10 refer to it as an organization, is all me. I
11 could be the marketing director. I could be the
12 janitor. I could be the CEO. I could be the
13 columnist. I could be the webmaster. I could be
14 the email communicator. It doesn't matter. But I
15 am all those things.

16 Now, I am principally the writer. So
17 I'm the guy who writes all of the content. So The
18 communications director is someone who
19 communicates with the public. And so that is why
20 I use that title.

21 Q. And you're also the individual
22 responsible for placing any content that you
23 created on the FreedomMan.org website to other
24 sites?

25 A. To other sites?

1 contact.

2 Q. Okay. Let me ask you this.

3 When it comes to maintaining the
4 evidence relating to content on the website
5 relevant to this litigation, are you the person
6 that controls that, also?

7 A. Yep.

8 Q. Okay. And you understand, right, given
9 the dispute, that the evidence relating to the
10 content of the website and changes needs to be
11 maintained?

12 A. Say it again? You said evidence
13 relating to the website needs to be what?

14 Q. I'll state it again, sir. I assume
15 that you understand that, given the disputes that
16 you've threatened and the lawsuit that we're here
17 for, that you're responsible for maintaining the
18 evidence relating to what was on the website when,
19 what was changed on the website?

20 A. I'm not aware of anything specific.
21 But, yes, all of the -- do I have backups of the
22 website? Do I have historical data? Yes, I do.
23 And so will I maintain all that? Absolutely.

24 Q. And also along those lines, maintain
25 the records of what was changed and when on the

1 Q. Yeah. Placing content that originated
2 from FreedomMan.org as it relates to the dispute
3 with St. Luke's, you're responsible for
4 coordinating the FreedomMan.org content being
5 placed on other websites; correct?

6 A. So I'm not aware of any of our content
7 being placed on any other websites. But if
8 content is placed on any other website that I'm
9 not aware of, either they just placed it there
10 without permission or maybe they did contact me
11 and I don't remember, because that whole period of
12 time when baby Cyrus was kidnapped was quite the
13 blur.

14 But, yes, if somebody did get
15 permission to post content from FreedomMan.org,
16 they only could have got that permission from me.

17 Q. Okay. And to the extent there was any
18 marketing of Freedom Man Press content relating
19 the issues with CPS -- excuse me, to the issues
20 with CPS or baby Cyrus or St. Luke's, you would
21 have been the point person for that, for Freedom
22 Man Press?

23 A. Correct. If there was any marketing,
24 and I don't remember any, I would have been the
25 point person. I would have been the point of

1 website, in particular as it relates to the issues
2 relating to the infant and St. Luke's?

3 A. So, yes, I have all of that. So the
4 way RapidWeaver works, I'm trying to think through
5 how any change updates would be noted. It's not
6 like a change log, if that's what you're familiar
7 with or if that's what you're referring to.

8 What it is, is they're basically -- I
9 wouldn't know how to explain it to you. They're
10 HTML files that are created. Those files created
11 are in backup files that have historical data. So
12 I can go back and say, okay, on this date, this is
13 what it was, and on this date, that's what it was.
14 And so I will maintain all that.

15 But if you're referring to change logs,
16 which is something that many people are familiar
17 with who are using database-driven websites, that
18 doesn't exist. So that doesn't exist with this
19 type of website because it's not database-driven.
20 It's pure HTML.

21 Q. Okay. All right. Let me take just a
22 moment, Mr. Rodriguez. I'm going to just put you
23 on mute for a second to take a quick look at my
24 notes. But I think we're -- if we're not done,
25 we're very close to it.

1 A. All right.
 2 (Brief pause in the proceedings.)
 3 Q. Mr. Rodriguez, I have just got a couple
 4 of questions. Let me just share my screen.
 5 A. Okay.
 6 Q. Mr. Rodriguez, what should be in front
 7 of you, and I'll represent to you it's a -- I have
 8 accessed the FreedomMan.org website.
 9 Do you see that?
 10 A. Okay. Yep.
 11 Q. And then if we go down to the bottom of
 12 the -- and I'll represent to you this is as it's
 13 reflected now, when I'm accessing it during your
 14 deposition.
 15 A. Okay.
 16 Q. If we go down to the bottom of the
 17 website, there's a current reference to an address
 18 at 317 Edgewater Drive, 507; correct?
 19 A. Yep.
 20 Q. Okay. And that's a virtual address;
 21 correct?
 22 A. Correct.
 23 Q. Okay. Then if we look at "Freedom Man
 24 links," I'm just going to click on it.
 25 Are you the individual who established

1 what is, I think, the opening page or home page, I
 2 should say, of the Freedom Man website. You
 3 should have that on your screen now.
 4 A. Yes.
 5 Q. Does that look to be accurate?
 6 A. Yes.
 7 Q. Okay. And then if we look at the
 8 latest news articles among them, is the article
 9 that's in yellow that identifies "Baby Cyrus was
 10 kidnapped"; correct?
 11 A. Correct.
 12 Q. Okay. And below that is, "St. Luke's
 13 is suing us for exposing them"; correct?
 14 A. Yep, correct.
 15 Q. And then a little bit further up,
 16 you've got, "My response to the Idaho Statesman
 17 lawsuit regarding the St. Luke's lawsuit."
 18 Do you see that?
 19 A. Yep.
 20 Q. Okay. And those are all stories that
 21 are currently in place on the FreedomMan.org
 22 website; correct?
 23 A. Correct.
 24 Q. Okay. I'm going to -- Mr. Rodriguez,
 25 if this looks to be a true and accurate reflection

1 these links on the FreedomMan.org website?
 2 A. Yes.
 3 Q. Okay. Idaho websites, the first one
 4 there is People's Rights; correct?
 5 A. Yep.
 6 Q. And you placed that link on there;
 7 correct?
 8 A. Yes.
 9 Q. Okay. Are you the individual who
 10 interfaces with People's Rights Network on behalf
 11 of FreedomMan.org?
 12 A. Well, there is no official
 13 People's Rights organization of any type or sort.
 14 So am I -- do I interface with people who identify
 15 themselves as members of the People's Rights
 16 Network? Yeah, all the time. Lots of my friends
 17 are part of the People's Rights Network.
 18 Q. Okay. I'm going to -- Mr. Rodriguez,
 19 I'm going to make a screenshot of this link to
 20 pro-freedom websites, including the Freedom Man --
 21 excuse me, including the People's Rights link here
 22 and make that Exhibit 7 to your deposition. Okay?
 23 A. Okay.
 24 (Exhibit 7 marked.)
 25 Q. All right. I'm going to go back to

1 of the current home page, I'm going to have that
 2 made as Exhibit 8 to your objection.
 3 Any objection to --
 4 A. Sounds good. No objection to that.
 5 (Exhibit 8 marked.)
 6 Q. Okay. Mr. Rodriguez, have you modified
 7 any of the content on the FreedomMan.org website
 8 relating to Dr. Erickson based on allegations in
 9 the lawsuit that you've defamed her?
 10 A. No, not that I can recall.
 11 MR. STIDHAM: Okay. That's where we'll
 12 stop, Mr. Rodriguez. I appreciate your patience.
 13 I'm sure we'll be interacting in the future in
 14 this litigation, but I appreciate your patience
 15 today. Thank you.
 16 THE WITNESS: Sure thing.
 17 THE VIDEOGRAPHER: Okay. The time is 10:16,
 18 and we are off the record. This concludes the
 19 deposition.
 20 (The deposition concluded at 10:16 a.m.)
 21 (Signature requested.)
 22 --o0o--
 23
 24
 25

VERIFICATION

1
2
3 STATE OF IDAHO)
4 County of Ada)

5
6 I, DIEGO RODRIGUEZ, being first duly
7 sworn on my oath, depose and say:

8 That I am the witness named in the
9 foregoing deposition, taken on October 5, 2022,
10 consisting of pages numbered 1 to 82, inclusive;

11 That I have read the said deposition and
12 know the contents thereof; that the questions
13 contained therein were propounded to me; that the
14 answers to said questions were given by me, and
15 that the answers as contained therein (or as
16 corrected by me therein) are true and correct.

DEPONENT

17
18
19 Signed and sworn before me this of , .

20
21 NOTARY PUBLIC
22 Residing at
23 My commission expires

24
25

REPORTER'S CERTIFICATE

1
2
3
4 I, Tiffany Fisher, RPR, CRR, a Notary
5 Public in and for the State of Idaho, do hereby
6 certify:

7 That prior to being examined, the
8 witness named in the foregoing deposition was by
9 me duly sworn to testify the truth, the whole
10 truth, and nothing but the truth;

11 That said deposition was taken down by
12 me in shorthand at the time and place therein
13 named and thereafter reduced into typewriting
14 under my direction, and that the foregoing
15 transcript contains a full, true, and verbatim
16 record of the said deposition.

17 I further certify that I have no
18 interest in the event of the action.

19 WITNESS my hand and seal

20 October 24, 2022.

21 Tiffany Fisher, Court Reporter
22 CSR No. 979



23 NOTARY PUBLIC in and for the State of Idaho;
24 residing at Boise, Idaho.

25 My commission expires September 13, 2028,
CSR No. 979

EXHIBIT B

From: Erik Stidham
Sent: Friday, February 17, 2023 2:51 PM
To: 'Freedom Man Press'
Subject: RE: Deposition Dates Moving to compel and seek sanctions

Mr. Rodriguez,

You violated a court order yet again. First, you were required to provide two options for two consecutive days of deposition. You did not provide a single, viable option.

Your email below states you will “attempt to make” yourself available in Brazil. As I am confident you were aware when you sent your email, that Brazil is not an option. See <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/Brazil.html>

Brazil is a party to the [Hague Convention on the Taking of Evidence Abroad in Civil and Commercial Matters](#) and permits depositions or other evidence gathering only with the participation of its court system. Evidence requests may be submitted directly to the [Brazilian Central Authority](#). The United States is not a party to the evidence provisions of the Inter-American Convention on Letters Rogatory and Additional Protocol. **Brazilian authorities do not permit persons, such as American attorneys, to take depositions for use in a court in the United States before a U.S. consular officer, with the assistance of a Brazilian attorney, or in any other manner. Brazilian law views the taking of depositions for use in foreign courts as an act that may be undertaken in Brazil only by Brazilian judicial authorities. The Government of Brazil asserts that, under Brazilian Constitutional Law, only Brazilian judicial authorities are competent to perform acts of a judicial nature in Brazil. Brazil has advised it would deem taking depositions in Brazil by foreign persons to be a violation of Brazil's judicial sovereignty. Such action potentially could result in the arrest, detention, expulsion, or deportation of the American attorney or other American participants.** The United States recognizes the right of judicial sovereignty of foreign governments based on customary international law and practice. It is the State Department's understanding that the Brazilian prohibition on taking depositions by foreign persons extends to telephone or video teleconference depositions initiated from the United States of a witness in Brazil. The U.S. Embassy or Consulates in Brazil could in no way participate in, or otherwise sanction, such a proceeding. The State Department advises U.S. citizens contemplating participation in such a proceeding, without Brazil's concurrence, obtained through diplomatic channels, to consider carefully the possible legal consequences of doing so.

Moreover, we are confident that you are available for deposition in Florida during the period identified by the Court.

My clients will seek appropriate sanctions, including, but not limited to fees and evidentiary sanctions.

Regards,

Erik Stidham

He / Him / His (What's this?)

Partner, Holland & Hart LLP

efstidham@hollandhart.com | T: | M:

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

From: Freedom Man Press

Sent: Tuesday, February 14, 2023 10:02 PM

To: Erik Stidham

Subject: Deposition Dates

External Email

Dear Erik He/Him/His Stidham -

I reject the notion of needing 2 days for a deposition to waste time and ask questions that you already know the answer to. It is evident you are simply trying to rack up billable hours in your endless gamesmanship and dishonorable evil actions, sucking St. Luke's dry (and the public from which they take their dollars).

I am not waiving any rights to challenge the order to sit for a two day meaningless deposition, but I nevertheless offer you the following 2 dates where I will attempt to make myself available while I will be working in Curitiba, Paraná, Brazil on March 24th and 25th.

I am sure you will enjoy Brazil and it will give you the chance to fellowship with other He/Him/His friends you can meet there.

Diego Rodriguez
Freedom Man Press

From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Wednesday, February 22, 2023 9:48 AM
To: Erik Stidham
Subject: RE: Deposition Dates Moving to compel and seek sanctions

External Email

Oh my, Erik He/Him/His Stidham! I guess I didn't realize that I should have provided **TWO** date options and I only provided **ONE**. I'm so sorry that you got your panties all twisted in a knot over that one.

So I have reviewed the order again and see that it plainly reads, *"IT IS HEREBY ALSO ORDERED THAT Diego Rodriguez must sit for an in-person two- day deposition that will be two consecutive days. Diego Rodriguez is required to inform Plaintiffs' counsel, Erik Stidham, of two possible start dates for this deposition that are between February 25, 2023 and March 25, 2023 by 12:00 p.m. on February 15, 2023. Diego Rodriguez must inform Plaintiffs' counsel in what city, state, and country that he will be in on those provided dates. Plaintiffs' counsel will then choose one of those start dates. These communications must be conducted by email so there is a record of the discussion."*

So what we find YET AGAIN, is that Erik He/Him/His Stidham is either an intentional and/or compulsive liar, or is just a psychopath and has no recognition of what is true or false and just spews out lies according to whatever he feels. But fear not, I have a running record and account of all of your obvious and intentional lies. And it will be filed with the appropriate authorities (i.e. the BAR) and justice will eventually be done. Your evil and wicked deeds can't go on forever, Erik He/Him/His Stidham.

You plainly stated below, "You violated a court order yet again" when I certainly did not. I provided you with an option and I let you what city, state, and country I would be in which is exactly what the order demanded. I certainly now recognize that I overlooked the request to provide TWO dates, but I'll provide them to you now. However, your contention about me being in Brazil is not a violation in any way as I am informing you of the City, State, and Country where I will be—which is what the order demanded. There were not any requirements put on the location nor can any court deprive me of my freedom to travel, particularly as someone who is a legal resident outside the United States. If you don't have any He/Him/His friends who will host you there in Brazil, then we can have the deposition over Zoom like we did last time. It's as simple as that.

If the Brazilian authorities arrest you based on what you have written below, well then we should just consider that JUSTICE for all of your lies, corruption, and wickedness. But rest assured, your He/Him/His contemporaries will take good care of you in a Brazilian jail.

So here, you've got your dates. Pick one:

March 22nd & 23rd
March 24th & 25th
Curitiba, Paraná, Brazil

Diego Rodriguez
Freedom Man Press

----- Original Message -----

EXHIBIT C



DIEGO RODRIGUEZ



ABOUT DIEGO

Who is Diego Rodriguez? And how can he help my business?

FREE RESOURCES

Get FREE Resources for Business Growth and Personal Development

PRODUCTS

Marketing, Recruitment, Video, and Time Management Products

Meet Diego Rodriguez

Diego Rodriguez is an author, motivational speaker, and entrepreneur. Currently, he is serving as the President of Power Marketing International, which consists of the Power Marketing Consultants Network—the largest international network of professional marketing consultants in the world, the Power Marketing Agency—which is the premier marketing agency for total market domination, and the Power Marketing Pantheon—the preeminent business network and training source for business growth and development.



"Diego doesn't just teach people how to think differently and overcome limiting beliefs. He's done it himself and he continues to do so. His enthusiasm is infectious. I'd encourage anyone and everyone to take advantage of his business systems and concepts." - **Robert Allen, New York Times Best Selling Author**



"Diego is the most talented local marketer I've ever met. If I got hit by a bus...Diego is the guy I'd choose to take my place. And if my son wanted to become a consultant and I wasn't around to teach him...I would want Diego to be the person to give him guidance." - **Frank Kern, Legendary Online Marketer**



"Diego is not only a personal friend and confidante, but he is one of the most brilliant marketers I've ever met. His successes speak for themselves and his systems are the best you'll find anywhere." - **Mike Koenigs, Traffic Geyser**



"Diego is one of the most brilliant marketing minds anywhere. He simply knows what works and he gets it done. He's helped our company greatly and I'd encourage anybody who gets the chance to work with him to do so!" - **Eric Lofholm - Eric Lofholm International (Sales Trainer for Tony Robbins)**

Diego is a highly sought after business growth consultant and was trained by Jay Abraham. He is the Senior Consultant and training director for the Power Marketing Pantheon. He was also the primary trainer in Mike Koenig's Instant Customer Revolution program and he has trained over 8,000 entrepreneurs in over 40 countries.

He was the creator of the HVAC Mastery Program (for Contractors), the PI Mastery Program (for Personal Injury Attorneys), and the Dental Mastery Program (for Dentists). He was also the creator of the marketing and business development program for Drone Command Live and the Sky Eye Network (for Drone operators).

Diego's *Power Marketing Program* has a 100% success record of growing any business in any industry and of any size. He has consulted businesses using the *Power Marketing Program* in dozens of industries across the world.

Diego also serves as the Communications Director for the Freedom Man PAC and commonly writes articles about freedom liberty, the Constitution, and the founding principles of America under the pseudonym, Gunner Steele.



Sign Up for the NEXT DIEGOCAST!



Visit Power Marketing

POPULAR LINKS:

- About Diego
- Free Resources
- Products
- Power Marketing

[Contact Diego](#)

CONTACT:
1317 Edgewater Dr. Suite 5077
Orlando, FL 32804
(321) 977-1444

SITE INFORMATION:
[Privacy Policy](#)
[Terms and Conditions](#)
[Site Map](#)

SOCIAL MEDIA LINKS:



EXHIBIT D



SERMON—Truth Still Matters



Watch this video on YouTube here: https://youtu.be/UVm_-45I2OE

Video of the opening worship service led by Bro. Otis McAlaster:



Galatians 5:1 *"Stand fast therefore in the liberty wherewith Christ hath made us free."*

Freedom Tabernacle is a legal church entity in Boise, Idaho. We were established in 2011 and our mission is to proclaim the Gospel of Jesus Christ to the world.

We believe that the Bible is the inerrant and Holy Word of God. We adopt as part of our Articles of Faith, the 1978 Chicago Statement on Biblical Inerrancy produced by the International Council on Biblical Inerrancy.

ADDRESS:
Freedom Tabernacle
1317 Edgewater Dr #5077
Orlando, FL 32804

SITE INFORMATION:
[Privacy Policy](#)
[Terms and Conditions](#)
[Site Map](#)
[Contact Us](#)

EXHIBIT E



Articles of Faith

ARTICLE ONE – FUNDAMENTAL DOCTRINE

SECTION 1 - CREED

Our creed, discipline, and doctrine is the Word of God as revealed in the text of the Holy Bible. We believe the Bible is the Inspired Word of God (2 Timothy 3:16-17).

SECTION 2 - INERRANCY OF THE HOLY BIBLE

We believe that the Bible is the Inerrant and Holy Word of God. We adopt as part of our Articles of Faith, the 1978 Chicago Statement on Biblical Inerrancy produced by the International Council on Biblical Inerrancy.

SECTION 3 - GRACE OF GOD

The precious gift of salvation has been afforded to mankind by the grace of God. "For by grace are ye saved through faith; and that not of yourselves; It is the gift of God." (Ephesians 2:8). A Christian, to keep saved, must walk with God and keep himself in the love of God (Jude 21) and in the grace of God. "For the grace of God that bringeth salvation hath appeared to all men, teaching us that, denying ungodliness and worldly lusts, we should live soberly, righteously, and Godly, in this present world." (Titus 2:11-12). The word "grace" means "favor" and also means "that which enables one to live the Christian life." When a person transgresses and sins against God, he loses his favor. If he continues to commit sin and does not repent, he will eventually be lost. (John 15:2, 6; Romans 11:22; 2 Peter 2:20-21).

SECTION 4 - SALVATION BY FAITH

The basic and fundamental doctrine of this organization shall be "salvation by grace through faith" by Jesus Christ our Lord (Ephesians 2:8). We believe that faith is more than just "mental assent," but rather a complete submission to the Lordship of Jesus Christ in every area of life.

SECTION 5 - THE DOCTRINE OF GOD

We believe in the one everlasting, eternal God; infinite in power; holy in nature, attributes and purpose; and possessing absolute, indivisible deity. As the eternal Spirit, He is everywhere at once, and cannot be seen, except in the person and face of Jesus Christ (Hebrews 1:3, John 14:6-9, Deuteronomy 6:4, Isaiah 9:6, Isaiah 44:6-8, John 1:1-14, 1 John 5:20, 1 Corinthians 8:6; Ephesians 4:6; 2 Corinthians 5:19).

The scripture does more than attempt to prove the existence of God, it asserts, assumes and declares that the knowledge of God is universal (Romans 1:19-21, Romans 2:15, Psalm 53:1). God is Spirit (John 4:24) and He is therefore invisible, incorporeal, without parts, and without a body. God is free from all limitations and His power, ability, and knowledge are beyond any human conception.

SECTION 6 - THE DEITY OF JESUS CHRIST

The One True God, known as Jehovah in the Old Testament, revealed Himself in the form of man, and as the Son of Man was born of the virgin Mary. "And without controversy great is the mystery of godliness: God was manifest in the flesh, justified in the Spirit, seen of angels, preached unto the Gentiles, believed on in the world, received up into glory." (1 Timothy 3:16).

We believe that, in Jesus "dwelleth all the fullness of the Godhead bodily." (Colossians 2:9). "For it pleased the Father that in him should all fullness dwell." (Colossians 1:19). Therefore Jesus, in His humanity, was and is man, yet in His Deity He was and is God. His flesh was the Lamb, or the sacrifice of God, and He is the only mediator between God and man. "For there is one God, and one mediator between God and men, the man Christ Jesus." (1 Timothy 2:5).

We believe that the reality that Jesus Christ is, at once, both God and man is a true unexplainable mystery. For how can one know how Jesus could be both God and man? While we cannot comprehend this fact, we believe that we can apprehend it, meaning that we can have confidence in its truth because of the testimony of scripture.

Since Jesus was simultaneously human and divine, He was known as the Son of God and also the Son of Man. We believe in His virgin birth, in His sinless life, in His miracles, in His vicarious and atoning death, in His bodily resurrection, in His ascension into the presence of God, and in His personal future return to this Earth.

We believe the blood of Jesus Christ is efficacious and that His blood alone atones for sin (1 Peter 1:19, 1 John 1:7) and that Jesus, as the Son of God, lived a sinless life.

In short, the Bible teaches that Jesus Christ was God incarnate who possessed "all the fullness of the Godhead bodily" (Colossians 2:9); that he was and is the very "image of the invisible God" (Colossians 1:15); that He is the "word made flesh" who "dwelt among us" (John 1:14); and He is "the brightness of [God's] glory, and the express image of his person" (Hebrews 1:3).

SECTION 7 - THE NAME OF JESUS CHRIST

God used different titles, such as "Elohim," "El Shaddai," and especially "Jehovah," the redemptive name, in the Old Testament. In the New Testament, the final culminating name is Jesus. "For unto us a child is born, unto us a son is given; and the government shall be upon his shoulder; and his name shall be called Wonderful, Counselor, the mighty God, the everlasting Father, the Prince of Peace." (Isaiah 9:6). This prophecy of Isaiah was fulfilled when the Son of God was named, "And she shall bring forth a son, and thou shalt call his name JESUS; for he shall save his people from their sins." (Matthew 1:21). The name, "Jesus" means "Jehovah salvation" or, "Jehovah has

Galatians 5:1 "Stand fast therefore in the liberty wherewith Christ hath made us free."

Freedom Tabernacle is a legal church entity in Boise, Idaho. We were established in 2011 and our mission is to proclaim the Gospel of Jesus Christ to the world.

We believe that the Bible is the Inerrant and Holy Word of God. We adopt as part of our Articles of Faith, the 1978 Chicago Statement on Biblical Inerrancy produced by the International Council on Biblical Inerrancy.

become our salvation." The name of Jesus is therefore the name whereby we must be saved. "Neither is there salvation in any other: for there is none other name under heaven given among men, whereby we must be saved." (Acts 4:12).

There is no efficacy for salvation in the name Jesus by itself (nor in its exact pronunciation), for there have been many who have possessed this name, but Jesus Christ of Nazareth is the only one who literally "became the name." Jesus Christ is "Jehovah Salvation" and we therefore recognize that wonders, signs, miracles, and salvation come through his name and faith in that name (Acts 3:16).

SECTION 8 - THE FALL AND REDEMPTION

We believe that in the beginning God created man innocent, pure, and holy. Unfortunately, by disobeying God's law, Adam sinned and mankind fell. Hence, by one man's disobedience, sin entered into the world (Romans 5:12). In the fullness of time, God revealed himself in the form of man and by His death on the cross, as the Son, redeemed man back to Himself (2 Corinthians 5:19). This redemption by His blood was for all men, but only those that have faith in God and His Word will be saved from the penalties of sin (Genesis 1:27, Romans 5).

SECTION 9 - ELECTION AND FREE WILL

God does not elect the individual to salvation, but rather the company called the Church. And though He is sovereign, He so exercises that sovereignty as to allow man to be sovereign over his own individual and eternal destiny. Man can choose or reject obedience to God's law and therefore has free will. We believe in the conditional security of the believer, but not the security of the backslider. (Revelation 22:17, John 15:1-6, Hebrews 6:4-6, Hebrews 10:26-29).

SECTION 9 - CREATION

"In the beginning God created the heaven and the earth." (Genesis 1:1). God is the creator of all things in the universe including mankind. The theory that evolution was the method used to create man is incorrect and untenable. Furthermore, we believe that the chronology connected with the account of Genesis (and the Bible as a whole) is accurate and divinely inspired. The Bible's account of a relatively recent creation, approximately 4000 years before the birth of Jesus Christ demands that we reject all notions of millions or billions of years in the history of the universe.

SECTION 10 - SECOND COMING OF JESUS AND THE RESURRECTION

That Jesus is coming again the second time in person, just as He went away, is clearly set forth by the Lord Jesus Himself, and was preached and taught in the early Christian church by the apostles. Hence, the children of God today are earnestly and hopefully, looking forward to that glorious event. (Acts 1:11; 3:19-21; 1 Corinthians 11:26; Philippians 3:20-21; 1 Thessalonians 4:13-18; Titus 2:13-14).

We believe that the time will come when our Lord shall appear, and the dead in Christ shall arise; and those who are alive and remain shall be caught up with them to meet our Lord in the air (1 Thessalonians 4:13-17; 1 Corinthians 15:51-54). We believe that at this time, the church shall partake of the resurrection and shall put on new bodies that are glorious and eternal, like the resurrected body of Jesus Christ (Philippians 3:20-21, 1 John 3:2).

SECTION 11 - THE NEW HEAVENS AND THE NEW EARTH

We believe that the resurrection shall culminate in the "restitution of all things" (Acts 3:21) and the restoration of God's perfect creation to a state like it was before the fall of man. By the power of the resurrection of Jesus Christ, all things will be made brand new and God will bring forth the "new heavens and the new earth wherein dwelleth righteousness." (2 Peter 3:13) where God's people will live with Him for eternity (Isaiah 65:17, Isaiah 66:22, Revelation 21:1).

ARTICLE TWO - THE CHURCH AND ITS MEMBERS

SECTION 1 - THE CHURCH

There is one Body or Church and only one way to enter into it. Namely, by faith, as evidenced by true repentance and the progressive manifestation of Christian fruit in the life of a believer.

We seek to be primitive Christians who trace our scriptural history back to the day of Pentecost in the book of Acts chapter two. We do not claim to be another sect or denomination, rather, a part of that great company of true believers that hold the scriptural form of doctrine and practice as the original church, "built upon the foundation of the apostles and prophets, Jesus Christ himself being the chief corner stone." (Ephesians 2:20).

SECTION 2 - EVANGELISM

The work of the church is to evangelize the entire world with the Gospel of Jesus Christ. This mandate was given by Jesus himself, "Go ye therefore and teach all nations..." (Matthew 28:19), and "preach the gospel to every living creature." (Mark 16:15). This necessary duty of evangelism requires the teaching and training of men and women and should be continued not only in regular church services, but also in ancillary ministries and para-church organizations. (Acts 5:42, 1 Timothy 4:11, 2 Timothy 2:2, Deuteronomy 6:7).

SECTION 3 - MINISTERIAL QUALIFICATION

True ministers are called of God, and must be sound in doctrine, morally clean, of good report, blameless, the husband of one wife, and able to teach and preach in a manner that will commend the gospel. If ever found guilty of immorality, heresy, dishonesty, or division, he shall be disqualified to further serve as a minister/elder. (1 Timothy 3:1-7; Titus 2:7-11).

SECTION 4 - THE MAN'S RESPONSIBILITY TO HIS FAMILY

According to the Word of God, it is a man's responsibility to provide for his family, spiritually and naturally. "But if any provide not for his own and specially for those of his own house, he has denied the faith and is worse than an infidel." (1 Timothy 5:8). Being the head of the house, the man should see that the general needs of his family are provided for (housing, food, clothing, etc.) It is also the man's responsibility to lead in his family's spiritual needs and disciple his own family. A man is to love his wife like Christ loved the church and gave himself for it (Ephesians 5:25). The church government structure should never usurp a man's authority over his own family.

SECTION 5 - A WOMAN'S POSITION

The place of a woman is clearly outlined in the Scriptures. The aged women are to teach the younger women, "...to love their husbands, to love their children, to be discreet, keepers at home, good, obedient to their own husbands..." (Titus 2:3-5). A Godly woman does not maintain authority over a man (1 Timothy 2:12), but is to be in subjection to her own husband and to have a meek and quiet spirit, which is in the sight of God of great price (1 Peter 3:1-4). The place of a biblical woman is one of honor, glory, and virtue, as she is the special prize of her husband and is to be particularly cared for by him. The Christian faith is unique in its care, protection, and exaltation of the woman, for she serves as the allegorical figure for the object of Christ's affection; that is, the church (Ephesians 5:32).

SECTION 6 - HEALING

We believe the vicarious suffering of our Lord Jesus Christ is for the healing of our souls and bodies, for "with his stripes we are healed" (Isaiah 53:5, Matthew 8:17, 1 Peter 2:24).

Supernatural healing is both possible and expected in the Kingdom of God. The gospel tells us that the people of God "shall lay hands on the sick, and they shall recover." (Mark 16:18). James wrote in his Epistle to all the churches, "Is any sick among you? let him call for the elders of the church, and let them pray over him, anointing him with oil in the name of the Lord: And the prayer of faith shall save the sick, and the Lord shall raise him up; and if he have committed sins, they shall be forgiven him. Confess your faults one to another, and pray one for another, that ye may be healed. The effectual fervent prayer of a righteous man availeth much." (James 5:14-16). We believe that all these promises are for the church today and for all time.

Furthermore, we believe in healing through Christian dominion. Christians should "take dominion" and learn the art and science of healing through medicine, surgery, nutrition, exercise, etc. We believe that Christians should be skilled in the area of healing the sick and should use these skills as a ministry to heal the nations in the name of Christ.

SECTION 7 - TITHING

We believe tithing is God's financial plan to provide for His work. Tithing came with faith under Abraham. It was commanded in the law of Moses, and Jesus did not annul it but rather endorsed it (Matthew 23:23). The Bible is complete in its teaching regarding the paying of tithes and true Christian believers should give 10% of their increase to the ministry of Jesus Christ (Malachi 3:8-10; Luke 11:42).

SECTION 8 - CHRISTIAN DOMINION

The purpose for mankind's existence is to bring God pleasure (Revelation 4:11) and we believe that this purpose is primarily fulfilled by exercising "Christian dominion." In the beginning, God himself gave mankind the duty of taking dominion over the Earth (Genesis 1:26) for the purpose of ruling over God's creation unto His glory. This original "dominion mandate" has never been withdrawn or abolished by the fall of man, the corruption of the devil, or the teachings of the New Testament. Jesus Christ taught in harmony with the Dominion Mandate in his famous Sermon on the Mount when he admonished his followers to be "salt and light" so that the world would see our "good works and glorify [our] Father which is in heaven." (Matthew 5:13-16). Therefore, Christians ought to fulfill the Dominion Mandate and work diligently to build and advance the Kingdom of God by influencing our families, communities, cities, states, and nations with the whole Gospel of Jesus Christ in every area of life. This would include, but is not limited to: advancing individual education, knowledge and thought; teaching and educating our families, friends, and nations to alleviate the scourge of ignorance; endeavoring to learn about God's creation through scientific inquiry; operating businesses and enterprises for the Glory of God; promoting Christian participation in government, politics, and law; developing, promoting, and supporting new technologies; tending to the sick, needy, and poor through the ministry of healing, medicine, and education; and by promoting and defending the Biblical principles of self-government and individual freedom to the nations of the world.

ARTICLE THREE – SACRAMENTS AND CHURCH ORDER

SECTION 1 - COMMUNION

On the night of our Lord's betrayal, He ate the Passover supper with His Apostles, after which He instituted the sacrament of communion. "And he took bread, and gave thanks and brake it, and gave unto them, saying, This is my body which is given for you: this do in remembrance of me. Likewise also the cup after supper, saying, This cup is the New Testament in my blood, which is shed for you." (Luke 22:19-20). Paul instructed the church how to observe it in his epistle to the Corinthian church (1 Corinthians 11:23-34). Thus was instituted the use of literal bread and wine, partaken of, as emblems of His broken body and shed blood. There is also a spiritual significance and blessing in partaking of this sacrament.

SECTION 2 - FOOT WASHING

When the Passover supper was ended, we read in John 13:4-5, "He riseth from supper, and laid aside his garments; and took a towel, and girded himself. After that he poureth water into a bason, and began to wash the disciples feet, and to wipe them with the towel wherewith he was girded." Jesus said, "If I then, your Lord and Master, have washed your feet; ye also ought to wash one another's feet: For I have given you an example, that ye should do as I have done to you." (John 13:14-15).

This first example was given by our Lord, and it is a divine institution. It is well to follow His example and wash one another's feet; thus manifesting the spirit of humility and obedience.

SECTION 3 - WATER BAPTISM

We believe that water baptism is a standard part of the Christian experience. Those who profess faith in Jesus Christ ought to be baptized in fulfillment of the scriptures. Baptism is part of the salvation experience not because of the "putting away of the filth of the flesh, but the answer of a good conscience toward God." (1 Peter 3:21-22). Baptism ought to be administered by full immersion invoking the name of Jesus Christ just as it was done by the original church in the Bible (Acts 2:38, Acts 8:15-16, Acts 19:5).

SECTION 4 - SPEAKING IN TONGUES AND SPIRITUAL GIFTS

The Bible declares that "speaking in tongues" was a normative experience for New Testament believers. This supernatural gift and experience continues to this day and should not be discouraged. However, Christians should tether their "speaking in tongues" experience to God's Word and ensure that they follow the Bible's teachings concerning its use. Namely, Christians (1) may pray in tongues unto themselves (1 Corinthians 14:4), (2) may bring forth a message in tongues amongst the church only if there is an interpreter available (1 Corinthians 14:27-28), (3) ensure that the giving of such "tongues messages" if given, are given in order and not all at once (1 Corinthians 14:27), (4) not allow women to give such messages (1 Corinthians 14:34), (5) not think of themselves more highly than their brethren who do not operate with such a gift (1 Corinthians 12:30, 1 Corinthians 14:37-40).

Furthermore, we recognize that the Spirit of God can work through special gifts that operate through believers for the purpose of edifying the body of Christ and as a sign to unbelievers (1 Corinthians 14:3; 22). Among these gifts are: supernatural healing, the gift of tongues, interpretation of tongues, working of miracles, word of knowledge, etc. (1 Corinthians 14:8-10, Mark 16:17-18). While there are "diversities of operations" (1 Corinthians 14:6), it is the same Spirit of God (1 Corinthians 14:11) that is the source of these gifts and therefore the operation of these gifts in the church should not be prevented so long as they operate in a manner that is consistent with Biblical order. "Wherefore, brethren, covet to prophesy, and forbid not to speak with tongues. Let all things be done decently and in order." (1 Corinthians 14:39-40).

ARTICLE FOUR – THE AFFAIRS AND ROLE OF THE CHURCH

SECTION 1 - THE SPHERES OF GOVERNMENT

The Bible indicates that there are four spheres of government that have been ordained by God to bring forth an orderly society. They are: state government, church government, family government, and self-government. Each of these spheres of government are distinct from another and should not intrude upon the jurisdiction of the other spheres.

Christian men and women should willingly submit themselves to each of the spheres of

government so long as they do not demand anything that is contrary to scripture. In such cases where unscriptural demands are made, Christians are required to be "subject to the higher powers;" (Romans 13:1) which ultimately is God's Word. "We ought to obey God rather than men;" (Acts 5:29).

For American Christians, the ultimate authority of state government resides in the Constitution of the United States. It is the "highest law of the land." Any lesser government order which defies or abridges the rights preserved in the Constitution is unlawful and should not be obeyed. And any rule or order of an amended Constitution that is contrary to the Word of God must also not be obeyed. We are subject "to the higher powers;"

SECTION 2 - THE ROLE OF STATE GOVERNMENT

State government is ordained by God's Holy Word and is charged with protecting its citizens and punishing evildoers (Romans 13:2-7). Christians should recognize that these duties must be financed by taxes and should not attempt to withhold their own taxes from the government(s) which protect them. We should render unto Caesar that which is Caesar's (Luke 20:25). This does not preclude however, the diligent work that Christians should undertake to ensure that taxes are not burdensome and egregious. Generally speaking, we feel that the Word of God gives a reasonable tax at 10% of the increase of the people (1 Samuel 8:15-17).

We recognize that God ordained the state government to execute justice and punish evildoers (Romans 13:2-7). To this end, Christians may not take the law into "their own hands" and act like vigilantes attempting to execute justice outside of the sphere of state government.

SECTION 3 - PARENTAL RIGHTS

We recognize that parents are the ultimate source of authority over their own children. Indeed the 5th commandment is to honor one's parents. The Bible expressly teaches that obeying this commandment is the first commandment with a promise associated with it (Ephesians 6:3) and that obeying one's parents brings longevity of life.

The training and provision of one's child is one of the most basic duties and responsibilities of adult parents (Proverbs 22:6, Proverbs 23:13-14), so much so that a man is considered worse than an infidel if he does not provide for his own family and children (1 Timothy 5:8).

Any force or government entity which would seek to usurp parental rights to take control over one's children must be resisted and denied at all levels.

It is an abridgement of the religious rights and conscience of every Christian to have their parental rights taken away from them. State government and external forces have no power or authority to force or determine a child's medical needs, spiritual needs, education, surroundings, discipline, media consumption, food choices, or any such like. These rights and determinations belong to the parents.

SECTION 4 - DOMINION OVER ONE'S BODY

The Bible teaches that our bodies are the temple of the Holy Ghost (1 Corinthians 3:16) and that we are to glorify God with our bodies (1 Corinthians 6:19-20) for we were bought with the blood of Jesus.

The Bible also specifically teaches us to not be conformed to this world in the context of how we use our bodies (Romans 12:1-2) and that our bodies should be offered to God as a "living sacrifice" in which we reject the pressures and demands of the world for how we ought to use our bodies and instead do with our bodies that which is "good, and acceptable" and "perfect, will of God."

Therefore, to exercise our faith in a pure conscience, Christians must have total control and dominion over our own bodies. As Christians, who have and exercise free will and dominion over our own bodies, our faith precludes us from allowing any external force or government to coerce us or demand that we accept any medical treatment against our will. This includes alleged "life-saving" procedures, vaccines for the "good and safety of the public," or any other forced medical action which causes us to surrender authority of our body over to another by force and against our free will.

SECTION 5 - MILITARY SERVICE AND STATE LOYALTY

We recognize the institution of state government as being of divine ordination, and, in so doing, affirm unswerving loyalty to our Government; however, we will not support the bearing of arms for the purpose of taking innocent human life.

As followers of the Lord Jesus Christ, the Prince of Peace, we believe in complete obedience to His commandments and precepts, which teach us among other things to "resist not evil" and that "if it be possible" to "live peaceably with all men;" (Matthew 5:39, Matthew 26:52, Romans 12:18-19). We believe that the whole of the scriptures teach us that Christians should not shed innocent blood nor take human life for any other purpose than personal or national defense.

Therefore, we propose to fulfill all the obligations of loyal citizens, but are constrained to declare against participating in combatant service in unjust war, armed insurrection, property destruction, or aiding or abetting in the actual destruction of innocent human life.

Furthermore, we cannot conscientiously affiliate with any union, boycott, or organization which will force or bind any of its members to belong to any organization, perform any duties contrary to our conscience, or receive any mark, without our right to affirm or reject the same.

However, we regret the false impression created by some groups of so called "conscientious objectors" that to obey the Bible is to have a contempt for law or magistrates, to be disloyal to our Government and in sympathy with our enemies, or to be unwilling to sacrifice for the preservation of our commonwealth. This attitude would be as contemptible to us as to any patriot. We therefore, exhort our members to freely and willingly respond to the call of our Government except in the matter of bearing arms against innocent parties. The true Church has no more place for cowards than has the nation. First of all, however, let us earnestly pray that we all, with honor, will be kept out of war.

We believe that we can be consistent in serving our Government in military duties, but not in the bearing of arms against innocent life. We further believe that our military personnel must live in a manner consistent with the articles of faith.

ARTICLE FIVE - CHRISTIAN STANDARDS AND MORALITY

SECTION 1 - HOLINESS

Godly living should characterize the life of every living child of God, and we should live according to the pattern and example given in the Word of God. "For the grace of God that bringeth salvation hath appeared to all men, teaching us that, denying ungodliness and worldly lusts, we should live soberly, righteously, and godly, in this present world;" (Titus 2:11-12). "For even hereunto were ye called: because Christ also suffered for us leaving us an example, that ye should follow his steps: Who did no sin, neither was guile found in his mouth: Who, when he was reviled, reviled not again; when he suffered, he threatened not; but committed himself to him that judgeth righteously;" (1 Peter 2:21-23). See also: Hebrews 12:14; 1 Timothy 2:9-10, 1 Peter 3:1-5; 1

The Bible teaches us that Christians should live a life of holiness: "But as he which hath called you is holy, so be ye holy in all manner of conversation; because it is written, Be ye holy; for I am holy. And if ye call on the Father, who without respect of persons judgeth according to every man's work, pass the time of your sojourning here in fear; Forasmuch as ye know that ye were not redeemed with corruptible things, as silver and gold, from your vain conversation received by tradition from your fathers; But with the precious blood of Christ, as of a lamb without blemish and without spot." (1 Peter 1:15-19).

For this reason, Christian clothing styles and dress should be according to scriptural designation and should promote a distinction between the genders. Men should not wear effeminate attire, nor should they wear dresses and/or skirts. Likewise, women should wear feminine attire and should refrain from wearing that which pertaineth to the man. "The woman shall not wear that which pertaineth unto a man, neither shall a man put on a woman's garment: for all that do so are abomination unto the LORD thy God." (Deuteronomy 22:5).

A lifestyle of holiness should extend far beyond the basic realm of appearance. Christian holiness extends to every area of life including but not limited to: speech, entertainment, music, relationships, attitudes, opinions, handling of finances, operation of business, etc.

SECTION 2 - MORAL ISSUES

Fornication is, by definition, sexual sin. Fornication includes: premarital sex, adultery, incest, and other acts of sexual deviancy (Acts 15:20, 1 Corinthians 7:2, 1 Thessalonians 4:3). Marriage on the other hand, is an institution founded and sanctioned by God who originally intended it to be a monogamous relationship in which each partner is faithful and true to the other (Genesis 2:22-24). Sexuality within the sanctity of marriage is holy and honorable and it is a gift from God (Hebrews 13:4).

Homosexuality is an abomination unto God and to all Christians. In the Old Testament it was dealt with harshly. Sodom and Gomorrah were destroyed because of the prevalence of homosexuality. Homosexuality and Christianity are fundamentally opposed to one another and a Christian may not be a homosexual (Leviticus 20:13, Romans 1:21-29, 1 Corinthians 6:9). Homosexuals should not be allowed to be members of any true Christian church.

The sanctity of human life in God's eyes is evidenced by his attitude toward those who take a man's life unlawfully. One of the 10 commandments is "Thou shalt not kill" (Exodus 20:13, Romans 13:9) which refers to murder. Murder is the act of unlawfully killing a human (and the only law which applies here is God's law). Euthanasia or so-called "mercy killings", including physician-assisted suicide of terminally ill or comatose patients, involves the act of unlawfully killing a human. Abortion, which is the taking of human life, is also strictly forbidden in the eyes of God (Exodus 21:22-23). Christians should do all within their power and sphere of influence to bring an end to any and all such practices wherever they exist in the world.

SECTION 3 - MARRIAGE AND DIVORCE

God ordained marriage and solemnized it as binding until death (Matthew 19:3-6). Christians are not to divorce their mates (Matthew 5:32). If, however, a spouse passes away, the widowed spouse is free to marry again, but only in the Lord (1 Corinthians 7:39). Having more than wife, though practiced in the Bible, is not pragmatic in our age and is grounds for disqualification from the office of a Bishop (1 Timothy 3:2).

No ordained minister of Freedom Tabernacle shall perform a marriage ceremony where one member of the marriage has been divorced with an ex-spouse still living.

SECTION 4 - PUBLIC SCHOOL

We disapprove of state-run educational institutions that have no authority in the Word of God to usurp the authority of parents to educate their own children. Parents are responsible for the education of their own children. Ideally, a child's primary education should be given by the parents in the home, and secondary education and additional studies should be supplemented by the church and other private educational institutions which are not funded by the state. All education should be directed by the discretion of the parents while the child lives in the parent's home and/or is under their headship.

SECTION 5 - TAKING OF HUMAN LIFE

Human life is sacred in scripture as all men were created in the image of God. The Word of God only gives us two instances in which the taking of another man's life is justifiable. They are: (1) in the case of self-defense (Exodus 22:2) and (2) as capital punishment for certain crimes (Genesis 9:6). Christians should reasonably be prepared to take the life of an attacker or criminal who has indicated that they will bring "irreparable harm or fatal injuries" to themselves, their families, or other innocent people.

Furthermore, Christians should not hesitate to be a part of a citizen based criminal justice system (i.e. jury) in which the outcome of the trial may sentence a convicted criminal to be executed at the hand of the state.

SECTION 6 - GOVERNMENT SUBSIDIES

No member of God's church should partake of any subsidies from the government. Government subsidies represent the unlawful expansion of state government into areas of life that are ordained by God to be fulfilled by churches and families. These types of unlawful subsidies include but are not limited to: welfare, cash aid, food stamps, subsidized housing, state run healthcare (i.e. Medicare, etc.), social security, and publicly funded education.

While we do not permanently condemn those who accept such subsidies, particularly those who have been trapped in these anti-biblical programs for many years before coming to Christ, we believe that mature Christians should strive to eliminate any and all government subsidies from their life. Acceptance of a government subsidy is a form of slavery and state-control that is antithetical to the biblical principles of self-government and individual freedom.

Furthermore, social welfare programs that seek to alleviate poverty, heal the sick, and care for widows and orphans were ordained by God to be handled by the church and by the institution of the family (Leviticus 19:9-10, 1 Timothy 5:3-11, James 1:27). Government-run social welfare programs have served to undermine the effectiveness of the church and destroy the institution of the family.

EXHIBIT F



0005149475



STATE OF IDAHO
Office of the secretary of state, Phil McGrane
ANNUAL REPORT

Idaho Secretary of State
PO Box 83720
Boise, ID 83720-0080
(208) 334-2301
Filing Fee: \$0.00

For Office Use Only

-FILED-

File #: 0005149475

Date Filed: 3/9/2023 7:49:27 AM

Entity Name and Mailing Address:

Entity Name: FREEDOM TABERNACLE, INCORPORATED
The file number of this entity on the records of the Idaho Secretary of State is: 0000573716
Address: DIEGO RODRIGUEZ
9169 W STATE ST # 3177
BOISE, ID 83714-1733

Entity Details:

Entity Status: Active-Good Standing
This entity is organized under the laws of: IDAHO
If applicable, the old file number of this entity on the records of the Idaho Secretary of State was: C189972

The registered agent on record is:

Registered Agent: DIEGO RODRIGUEZ
Registered Agent
Physical Address: 1876 E ADELAIDE
MERIDIAN, ID 83642
Mailing Address: 1876 E ADELAIDE DR
DIEGO RODRIGUEZ
MERIDIAN, ID 83642-9219

Agent or Address Change

Select if you are appointing a new agent.

The name and street address of the new registered agent and office in Idaho is:

Registered Agent: Registered Agent
Diego Rodriguez
Physical Address: DIEGO RODRIGUEZ
9169 W STATE ST
#3177
BOISE, ID 83714
Mailing Address: DIEGO RODRIGUEZ
9169 W STATE ST # 3177
BOISE, ID 83714-1733

I affirm that the registered agent appointed has consented to serve as registered agent for this entity.

Corporate Officers and Directors:

Name	Title	Business Address
<input checked="" type="checkbox"/> Diego Rodriguez	President	1876 E ADELAIDE MERIDIAN, ID 83642

B0784-6442 03/09/2023 7:49 AM Received by Office of the Idaho Secretary of State



+ Diego Rodriguez	President	DIEGO RODRIGUEZ 9169 W STATE ST #3177 BOISE, ID 83714-1733
-------------------	-----------	---

The annual report must be signed by an authorized signer of the entity.

Job Title: President

Diego Rodriguez

03/09/2023

Sign Here

Date